

# EXHIBIT 11

Bridgestone's Counter-Designations to Deposition Designations Made By Acushnet						
Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by Bridgestone	Objection
11/2/2006	Jonathon Doyle	6:24-7:9	Acushnet		12:2-25	
		9:2-14	Acushnet		13:2-25	
		11:8-12:1	Acushnet			
		14:1-7	Acushnet			
		20:13-19	Acushnet			
8/29/2006	Yoshinori Egashira	6:14-16	Acushnet		25:16-26:6	58:20-60:4
		8:16-9:6	Acushnet		26:16-28:7	61:17-64:4
		26:7-15	Acushnet		28:18-30:9	
		28:8-17	Acushnet		31:12-16	
		30:10-31:11	Acushnet		37:5-40:5	
		31:17-32:21	Acushnet		40:9-15	
		40:6-8	Acushnet		41:14-42:7	
		40:16-41:13	Acushnet		52:10-20	
		42:8-43:15	Acushnet		53:4-54:6	
		52:5-9	Acushnet		54:12-56:14	
		52:21-53:3	Acushnet		57:14-58:19	
		54:7-11	Acushnet		74:4-15	
		56:15-57:13	Acushnet		75:10-76:9	
		73:12-74:3	Acushnet		76:12-77:6	
		74:16-75:9	Acushnet		86:16-20	
		76:10-11	Acushnet		87:9-88:2	
		77:7-78:6	Acushnet		88:5-8	
		86:1-15	Acushnet		94:9-20	
		86:21-87:8	Acushnet		95:11-98:7	
		88:3-4	Acushnet		99:4-7	
		89:2-10	Acushnet		99:19-24	
		93:16-94:8	Acushnet		101:3-16	
		94:21-95:10	Acushnet		102:4-6	
		98:8-99:3	Acushnet		112:12-114:4	
		99:8-18	Acushnet		115:2-7	
		100:1-101:2	Acushnet		118:9-24	

Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by Bridgestone	Objection	Acushnet's Reply Designations
		101:17-102:3	Acushnet		119:3-4		
		102:7-13	Acushnet		119:17-120:8		
		114:5-115:1	Acushnet		121:3-8		
		117:17-118:8	Acushnet				
		119:1-2	Acushnet				
		119:5-16	Acushnet				
		120:9-121:2	Acushnet				
		121:9-122:11	Acushnet				
8/30/2006	Yoshinori Egashira	21:11-17	Acushnet		19:12-21:10		27:21-28:3
		21:21-22:2	Acushnet		21:18-20		78:18-79:15
		22:21-23:5	Acushnet		24:18-20		
		24:21-25:10	Acushnet		25:11-27:1		
		27:2-10	Acushnet		27:11-20		
		31:4-11	Acushnet		38:4-39:18		
		39:19-22	Acushnet		40:1-3		
		40:04:00	Acushnet		40:5-13		
		43:6-44:3	Acushnet		44:4-8		
		44:9-45:12	Acushnet		45:13-19		
		45:20-47:4	Acushnet		47:5-7		
		47:8-48:12	Acushnet		48:12-49:3		
		49:4-12	Acushnet		49:13-18		
		49:19-20	Acushnet		51:20-22		
		50:10-51:19	Acushnet		52:3-14		
		52:1-3	Acushnet		53:5-53:4		
		52:15-53:4	Acushnet		54:9-55:19		
		54:5-8	Acushnet		56:4-13		
		55:20-56:3	Acushnet		57:1-7		
		56:14-22	Acushnet		68:6-10		
		68:11-20	Acushnet		68:21-22		
		69:01:00	Acushnet		69:2-14		
		70:5-16	Acushnet		73:6-15		
		72:7-73:5	Acushnet		73:21-75:15		
		73:16-21	Acushnet		75:18-19		

Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by Bridgestone	Objection	Acushnet's Reply Designations
		75:16-17	Acushnet		76:3-10		
		75:20-76:2	Acushnet		76:15-21		
		76:11-14	Acushnet		77:4-6		
		76:22-77:3	Acushnet		77:9-78:17		
		77:7-8	Acushnet		85:5-6		
		84:17-85:4	Acushnet		85:12-22		
		85:7-11	Acushnet		86:5-8		
		86:1-4	Acushnet				
8/30/2006	Yoshinori Egashira Vol. 2	11:11-12	Acushnet				
		11:18-12:7	Acushnet				
		16:21-17:22	Acushnet				
		26:15-18	Acushnet				
		26:22-27:4	Acushnet				
		28:14-16	Acushnet				
		29:4-5	Acushnet				
		29:11-16	Acushnet				
		30:4-6	Acushnet				
		31:14-32:12	Acushnet				
		33:6-10	Acushnet				
9/28/2006	Yoshinori Egashira	6:21-7:1	Acushnet		7:2-3		
		7:4-6	Acushnet		7:7		
		7:8-13	Acushnet		7:14-8:5		
		8:6-9	Acushnet		8:10-11		
		8:12-15	Acushnet		8:16-9:15		
		9:16-11:11	Acushnet		16:15-17:9		
		17:10-12	Acushnet		20:9		
		20:6-8	Acushnet		21:16-17		
		20:10-12	Acushnet		22:8-10		
		21:14-15	Acushnet		25:15-26:19		
		21:18-22:2	Acushnet		27:16-28:6		

Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by Bridgestone	Objection	Acushnet's Reply Designations
		22:11-18	Acushnet		36:7-16		
		26:20-27:15	Acushnet		36:18-37:9		
		28:7-30:1	Acushnet		37:20-39:1		
		34:1-36:6	Acushnet		40:1-5		
		36:17:00	Acushnet		42:17-43:4		
		37:10-19	Acushnet		46:2-22		
		39:2-18	Acushnet		47:17-49:4		
		40:6-42:16	Acushnet		49:19-50:5		
		43:5-45:12	Acushnet		50:10-51:13		
		46:1-47:16	Acushnet		52:13-18		
		49:5-18	Acushnet		53:1-9		
		50:6-9	Acushnet		53:12-14		
		51:14-52:12	Acushnet				
		52:19-22	Acushnet				
		53:10-11	Acushnet				
		53:15-54:7	Acushnet				
9/29/2006	Yoshinori Egashira	90:5-19	Acushnet		87:11-90:4		86:6-16
		91:19-92:1	Acushnet		90:20-91:18		109:5-110:4
		92:12-20	Acushnet		92:2-11		139:17-18
		93:8-97:5	Acushnet		92:21-93:7		141:10-13
		97:15-99:12	Acushnet		97:6-14		143:18-145:2
		102:16-103:6	Acushnet		101:10-102:15		145:17-22
		103:15-106:13	Acushnet		103:7-14		
		108:9-17	Acushnet		106:14-108:8		
		122:12-123:3	Acushnet		108:18-109:4		
		123:20-124:7	Acushnet		123:4-19		
		124:21-125:6	Acushnet		124:8-20		
		126:21-127:9	Acushnet		125:7-126:20		
		128:1-5	Acushnet		127:10-22		
		128:20-22	Acushnet		128:6-19		
		134:1-135:2	Acushnet		132:5-133:22		
		135:21-137:21	Acushnet		135:3-10		
		146:1-19	Acushnet		139:7-16		

Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by BridgeStone	Objection	Acushnet's Reply Designations
					139:21-141:9		
					141:14-16		
					141:20-21		
					142:1-143:11		
					143:15-17		
10/2/2006	Yoshinori Egashira	28:1-22	Acushnet		27:16-22		
		36:15-22	Acushnet		38:5-22		
		37:1-13	Acushnet		39:5		
		38:1-22	Acushnet				
		39:1-4	Acushnet		39:15		
		39:6-14	Acushnet		40:14-17		
		39:16-40:2	Acushnet		41:1-21		
		40:8-13	Acushnet		42:2-3		
		40:18-22	Acushnet		42:11-12		
		41:22-42:1	Acushnet		42:16-18		
		42:3-10	Acushnet		42:21-43:15		
		42:13-16	Acushnet		49:16-50:5		
		42:19-20	Acushnet				
		45:4-14	Acushnet				
		46:19-49:15	Acushnet				
		56:7-22	Acushnet				
		57:1-22	Acushnet				
		58:12-22	Acushnet				
		59:1-22	Acushnet				
		60:1-22	Acushnet				
		61:1-7	Acushnet				
		61:15-22	Acushnet				
		62:1-8	Acushnet				
		70:15-22	Acushnet				
		71:1-3	Acushnet				
		72:13-22	Acushnet				
		73:1-22	Acushnet				
		74:1-2	Acushnet				

Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by Bridgestone	Objection	Acushnet's Reply Designations
		76:7-22	Acushnet				
		77:1-22	Acushnet				
		78:1-17	Acushnet				
10/2/2006	Yoshinori Egashira 30(b)(6) - Vol. 2	39:6-14	Acushnet				
		39:16-40:2	Acushnet				
		40:8-13	Acushnet				
		40:18-22	Acushnet				
		41:22-42:1	Acushnet				
		42:3-10	Acushnet				
		42:13-16	Acushnet				
		42:19-20	Acushnet				
		48:20-49:2	Acushnet				
		49:5-7	Acushnet				
10/3/2006	Yoshinori Egashira	5:21-6:10	Acushnet		25:22-29:10		
		17:17-25:21	Acushnet		35:18-45:17		
		29:11-35:17	Acushnet		46:18-48:22		
		45:18-46:17	Acushnet		49:18-50:18		
		49:1-17	Acushnet		51:14-53:15		
		50:19-51:13	Acushnet		62:7-14		
		54:8-14	Acushnet		63:15-64:8		
		62:15-22	Acushnet		64:18-65:3		
		63:1-14	Acushnet		78:2-9		
		64:9-17	Acushnet		79:8-80:11		
		77:16-78:1	Acushnet				
		78:10-22	Acushnet				
		79:2-7	Acushnet				
		80:12-84:8	Acushnet				
8/31/2006	Hiroshi Higuchi	53:7-21	Acushnet		11:16-21		
		56:6-16	Acushnet		50:10-53:6		
		58:20-59:2	Acushnet		58:13-19		

Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by Bridgestone	Objection	Acushnet's Reply Designations
		66:19-67:9	Acushnet		76:22-77:1		
		77:2-10	Acushnet		77:11-12		
		77:13-14	Acushnet		77:15-78:11		
		78:12-18	Acushnet		78:18-79:18		
		84:12-20	Acushnet		84:8-11		
		85:1-6	Acushnet		84:21-22		
		98:13-99:14	Acushnet		85:7-86:1		
		108:22-109:11	Acushnet		109:12-18		
		109:19-110:3	Acushnet		110:4-12		
		110:13-22	Acushnet		113:12-15		
		113:9-11	Acushnet		114:22-115:15		
		113:16-17	Acushnet		115:22-116:5		
		114:20-21	Acushnet		118:13-120:17		
		115:16-21	Acushnet		121:5-8		
		116:6-11	Acushnet		122:9-127:2		
		117:13-118:12	Acushnet		136:10-138:13		
		120:18-121:4	Acushnet		139:14-142:16		
		121:9-122:8	Acushnet		143:13-144:6		
		127:3-129:13	Acushnet		144:21-146:8		
		136:2-9	Acushnet		146:12-147:13		
		138:14-139:13	Acushnet		147:21-148:5		
		142:17-143:12	Acushnet		149:22-150:3		
		144:7-20	Acushnet		150:8-151:15		
		146:9-11	Acushnet		160:10-12		
		147:14-20	Acushnet		160:15-162:2		
		148:6-149:21	Acushnet				
		150:4-7	Acushnet				
		160:7-9	Acushnet				
		160:13-14	Acushnet				
		162:3-163:12	Acushnet				
		167:5-10	Acushnet				
9/1/2006	Hiroshi Higuruchi - Vol. 2	186:15-17	Acushnet		186:18-187:17		

Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by Bridgestone	Objection	Acushnet's Reply Designations
		187:18-188:3	Acushnet		188:4-10		
		188:11-18	Acushnet		188:19-21		
		188:22-189:4	Acushnet		189:5-191:2		
		191:3-6	Acushnet		215:17-216:1		
		224:11-14	Acushnet		217:16-224:10		
		227:22-228:1	Acushnet		224:15-226:3		
		229:7-15	Acushnet		228:2-229:6		
		230:4-8	Acushnet		229:16-230:3		
		230:15-17	Acushnet		230:9-14		
		234:15-21	Acushnet		230:18-234:14		
		252:4-16	Acushnet		261:14-263:4		
		261:1-13	Acushnet		266:16-269:1		
		263:5-266:15	Acushnet		271:9-19		
		269:2-271:8	Acushnet		272:1-4		
		271:20-22	Acushnet		272:20-276:3		
		272:5-18	Acushnet		276:8-18		
		276:4-7	Acushnet		277:5-19		
		276:19-277:4	Acushnet		279:22-10		
		277:20-278:21	Acushnet		280:6-12		
		279:11-280:5	Acushnet		281:9-21		
		280:13-281:8	Acushnet		284:7-12		
		281:22-284:6	Acushnet		284:14-9		
		284:13:00	Acushnet		286:2-288:16		
		285:10-286:1	Acushnet				
		288:17-289:12	Acushnet				
10/5/2006	Hiroshi Higuchi	13:14-14:7	Acushnet		13:10-13		41:21-44:17
		14:12-20	Acushnet		14:8-11		60:15-65:2
		34:20-35:10	Acushnet		34:16-19		66:1-72:19
		129:12-16	Acushnet		129:11:00		75:16-76:2
		130:2-132:14	Acushnet		129:17-130:1		80:6-92:8
					132:15-135:16		
10/6/2006	Hiroshi Higuchi	15:18-21	Acushnet		15:12-17		25:12-16

Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by Bridgestone	Objection	Acushnet's Reply Designations
		16:18-17:8	Acushnet		15:22-16:17		29:10-16
		18:20-19:8	Acushnet		26:13-29:3		80:19-22
		29:4-9	Acushnet		40:3-13		
		37:22-40:2	Acushnet		52:4-53:4		
		40:14-21	Acushnet		53:12-54:16		
		53:5-11	Acushnet		68:9-69:8		
		54:17-55:22	Acushnet		75:10-78:18		
		69:9-14	Acushnet		79:7-80:6		
		74:18-75:9	Acushnet		81:1-83:13		
		78:19-79:6	Acushnet		88:7-19		
		88:3-6	Acushnet		89:1-90:19		
		88:20-22	Acushnet		107:13-110:18		
		93:10-15	Acushnet		111:4-15		
		96:22-100:5	Acushnet		112:8-13		
		105:20-107:12	Acushnet				
		110:19-111:3	Acushnet				
		111:16-112:7	Acushnet				
10/9/2006	Hiroshi Higuchi	12:21-22	Acushnet		65:3-66:10		95:19-96:8
		13:1-21	Acushnet		79:8-11		
		63:18-65:2	Acushnet		93:18-94:11		
		66:11-19	Acushnet		94:18-95:18		
		78:20-79:8	Acushnet				
		91:17-92:10	Acushnet				
		93:12-17	Acushnet				
		94:12-17	Acushnet				
3/30/2007	Kevin L. Jones	11:9-19	Acushnet		13:4-16:20		41:20-44:15
		16:21-17:3	Acushnet		17:4-17		45:4-46:18
		19:1-30:4	Acushnet		30:5-31:17		47:8-48:2
		31:18-35:8	Acushnet		35:9-41:19		
		76:18-79:24	Acushnet		44:16-45:3		
		80:6-87:19	Acushnet		77:1-78:24		
		91:3-93:21	Acushnet		87:20-91:2		

Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by Bridgestone	Objection	Acushnet's Reply Designations
		94:4-7	Acushnet		93:22-94:3		
		95:8-96:10	Acushnet		94:8-95:7		
		97:1-100:2	Acushnet		100:3-102:2		
		102:3-103:9	Acushnet		103:10-21		
		103:22-104:11	Acushnet		104:11-24		
		104:22-106:7	Acushnet		106:8-107:7		
		107:8-109:2	Acushnet		109:3-110:17		
		110:18-118:15	Acushnet		135:11-136:17		
		120:8-131:11	Acushnet		141:24-143:2		
		132:10-135:10	Acushnet		153:8		
		136:18-141:23	Acushnet		158:13-160:9		
		143:11-144:8	Acushnet		165:13-166:10		
		144:14-149:4	Acushnet		174:9-15		
		151:7-153:7	Acushnet		176:12		
		153:23-158:12	Acushnet		178:8-9		
		160:10-162:3	Acushnet		180:10		
		162:13-165:3	Acushnet		182:4		
		166:11-174:8	Acushnet		184:19-186:3		
		174:16-176:11	Acushnet		186:17		
		176:13-178:7	Acushnet		187:19-21		
		178:10-180:9	Acushnet		189:5-12		
		180:11-182:3	Acushnet		189:21-5		
		182:5-184:18	Acushnet		192:2		
		186:4-16	Acushnet		193:5		
		186:18-187:18	Acushnet		195:21-196:1		
		187:22-189:4	Acushnet				
		189:13-189:20	Acushnet				
		190:6-192:1	Acushnet				
		192:3-193:4	Acushnet				
		193:17-195:23	Acushnet				
		196:2-18	Acushnet				
7/11/200	Michael David Jordan	30:16-18	Acushnet		No counter-designations		

Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by Bridgestone	Objection	Acushnet's Reply Designations
		36:6-37:9	Acushnet				
		37:19-39:4	Acushnet				
		41:2-42:1	Acushnet				
		44:11-44:15	Acushnet				
		83:18-85:14	Acushnet				
		171:5-12	Acushnet				
		192:18-193:10	Acushnet				
		196:2-4	Acushnet				
		197:7-15	Acushnet				
		197:22-198:13	Acushnet				
		210:2-9	Acushnet				
		221:13-222:12	Acushnet				
		223:11-20	Acushnet				
		264:21-265:10	Acushnet				
		285:22-288:18	Acushnet				
1/11/2006	Jun Ichinose	10:3-11:7	Acushnet		11:8-12:7		
		13:17-21	Acushnet				
6/1/2006	Jun Ichinose	59:1-62:6	Acushnet		57:5-18		58:19-22
		66:15-18	Acushnet		57:5-6		
		67:3-68:5	Acushnet		58:9-18		
		69:11-74:5	Acushnet		66:7-14		
					66:19-67:2		
					68:6-12		
					74:22-75:5		
9/1/2006	Atsuki Kasashima	7:18-8:6	Acushnet		50:19-52:11		67:14-69:5
		44:2-22	Acushnet		53:10-56:20		
		45:1-22	Acushnet		58:1-20		
		46:1-5	Acushnet		63:12-65:12		
		52:12-53:9	Acushnet		66:20-67:13		
		65:13-66:19	Acushnet		77:13-78:6		
		78:7-84:12	Acushnet		84:13-86:14		

Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by Bridgestone	Objection	Acushnet's Reply Designations
		86:15-88:21	Acushnet		88:22		
		102:7-22	Acushnet		101:17-102:6		
		117:6-22	Acushnet		118:8-119:21		
		118:1-8	Acushnet		120:9-121:22		
10/5/2006	Atsuki Kasashima	11:19-12:3	Acushnet		12:4		
		28:6-7	Acushnet		28:3-5		
		28:14-37:2	Acushnet		28:8-13		
		39:9-15	Acushnet		37:3-38:3		
		41:1-50:12	Acushnet		38:14-39:8		
		64:18-65:3	Acushnet		39:14-17		
		71:7-72:7	Acushnet		50:13-51:13		
		87:16-18	Acushnet		62:14-64:17		
		89:1-93:5	Acushnet		65:4-15		
		90:1-92:22	Acushnet		72:8-73:1		
		118:1-122:13	Acushnet		87:11-15		
					93:6-94:3		
					122:14-126:12		
11/9/2006	Akihiko Morikawa	8:8-16	Acushnet		29:21-31:22		92:20-94:22
		9:21-10:3	Acushnet		45:6-46:12		115:1-117:7
		11:21-26:11	Acushnet		46:21-47:11		119:5-7
		29:7-20	Acushnet		50:13-54:3		
		32:1-33:17	Acushnet		72:2-7		
		34:13-17	Acushnet		75:6-76:15		
		37:9-40:4	Acushnet		77:2-78:9		
		41:5-18	Acushnet		85:7-87:9		
		42:6-22	Acushnet		90:22-92:19		
		43:1-19	Acushnet		107:17-108:12		
		46:13-20	Acushnet		113:18-114:8		
		49:6-20	Acushnet		118:18-119:4		
		50:7-12	Acushnet		121:11-122:21		
		56:4-16	Acushnet				
		57:11-58:18	Acushnet				

Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by Bridgestone	Objection	Acushnet's Reply Designations
		71:19-22	Acushnet				
		81:15-18	Acushnet				
		82:14-17	Acushnet				
		87:20-22	Acushnet				
		107:11-16	Acushnet				
		117:21-118:17	Acushnet				
11/10/2006	Akihiko Morikawa	5:22-6:10	Acushnet		6:11-7:2		
		7:3-6	Acushnet		7:7-8:4		
		8:5-15	Acushnet		8:16-9:3		
		9:4-9	Acushnet		9:10-21		
		10:1-21	Acushnet		21:14-23:11		
		23:12-24:13	Acushnet		24:14-25:5		
		29:22-30:1	Acushnet		25:19-26:4		
		30:15-16	Acushnet		31:16-33:3		
		31:1-3	Acushnet		34:18-35:16		
					38:4-41:9		
10/19/2006	Hiroynki Nagasawa	8:17-9:22	Acushnet		62:14-63:8		
		62:1-13	Acushnet		64:19-22		
		63:9-17	Acushnet		66:8-68:3		
		64:6-18	Acushnet		70:10-18		
		65:19-66:7	Acushnet		71:7-15		
		68:4-70:9	Acushnet		72:4-10		
		70:19-71:6	Acushnet		72:19-20		
		71:16-72:3	Acushnet				
		72:11-18	Acushnet				
10/17/2006	Shigeru Nakayama	8:9-17	Acushnet		14:18-20		17:16-18:3
		9:2-4	Acushnet		14:22-15:18		48:7-49:10
		9:13-10:13	Acushnet		16:9-19		61:9-12
		12:8-13:3	Acushnet		17:4-6		
		14:5-10	Acushnet		17:9-15		

Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by BridgeStone	Objection	Acushnet's Reply Designations
		15:19-16:1	Acushnet		19:14-20:10		
		16:6-8	Acushnet		20:17-22		
		16:20-17:3	Acushnet		46:17-47:11		
		19:9-13	Acushnet		47:15-17		
		20:11-16	Acushnet		48:1-5		
		44:16-46:15	Acushnet		50:5-16		
		49:11-50:4	Acushnet		51:6-14		
		51:16-22	Acushnet		54:17-21		
		52:5-11	Acushnet		61:14-21		
		52:22-53:14	Acushnet		64:3-5		
		53:20-54:16	Acushnet		65:22-66:5		
		54:22-55:20	Acushnet		73:18		
		56:3-8	Acushnet		94:16-95:1		
		56:13-18	Acushnet		121:4		
		57:12-58:3	Acushnet		121:9-122:1		
		58:10-60:2	Acushnet		122:17-123:6		
		60:11-61:8	Acushnet		129:20-120:7		
		61:22-62:6	Acushnet		130:9-131:2		
		63:1-19	Acushnet				
		64:7-8	Acushnet				
		64:12-16	Acushnet				
		65:1-3	Acushnet				
		65:9-21	Acushnet				
		67:12-68:1	Acushnet				
		72:5-12	Acushnet				
		72:20-21	Acushnet				
		73:1-5	Acushnet				
		73:9-11	Acushnet				
		73:14-17	Acushnet				
		75:18-76:19	Acushnet				
		78:3-80:6	Acushnet				
		80:14-81:9	Acushnet				
		95:5-97:1	Acushnet				
		120:1-121:2	Acushnet				

Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by Bridgestone	Objection	Acushnet's Reply Designations
		129:2-14	Acushnet				
		129:11-129:14	Acushnet				
10/18/2006	Shigeru Nakayama	159:8-18	Acushnet		158:13-14		211:19-214:22
		161:5-161:9	Acushnet		158:16-20		256:17-257:2
		180:4-182:16	Acushnet		158:22-159:2		
		183:17-21	Acushnet		159:5-6		
		184:2-19	Acushnet		160:3-6		
		192:9-12	Acushnet		160:9-12		
		192:17-193:9	Acushnet		160:14-16		
		193:19-197:21	Acushnet		160:19-20		
		223:20-225:19	Acushnet		183:5-10		
		227:13-232:17	Acushnet		185:10-21		
		252:16-253:3	Acushnet		186:2-4		
		253:13-253:21	Acushnet		186:6-10		
		255:21-256:8	Acushnet		189:9-16		
		259:4-11	Acushnet		192:13-15		
		261:6-13	Acushnet		193:10-18		
					211:4-18		
					253:5-12		
					256:10-16		
					257:12-19		
					261:14-17		
					266:17-20		
					272:10-13		
					272:15-273:13		
9/21/2006	Atsushi Namba	9:8-21	Acushnet		18:12-19:13		
		19:15-20:6	Acushnet		20:8-14		
		34:15-35:6	Acushnet		35:8-15		
		36:1-8	Acushnet		39:15-40:1		
		36:14:00	Acushnet		41:12-17		
		38:20-22	Acushnet		42:12-16		
		39:8-10	Acushnet		44:6-11		

Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by Bridgestone	Objection	Acushnet's Reply Designations
		40:9-17	Acushnet		45:19-22		
		41:18-19	Acushnet		50:10-22		
		42:7-10	Acushnet		54:14-55:2		
		42:17-43:21	Acushnet		58:13-15		
		44:12-18	Acushnet		59:16-19		
		45:1-3	Acushnet		60:4-8		
		45:11-18	Acushnet		67:3-5		
		46:11-49:9	Acushnet		67:7-68:5		
		49:15-22	Acushnet		69:9-12		
		51:1-20	Acushnet		74:13-15		
		55:3-56:2	Acushnet		80:11-13		
		56:22-57:10	Acushnet		80:15-17		
		57:16-19	Acushnet		81:21-82:5		
		58:16-59:1	Acushnet		97:4-7		
		60:9-11	Acushnet		98:12-16		
		61:13-21	Acushnet		102:12-103:1		
		62:7-19	Acushnet		103:22-104:2		
		63:4-6	Acushnet		104:10		
		63:9-15	Acushnet		104:14-17		
		63:21-22	Acushnet		104:19		
		64:3-13	Acushnet		109:5-6		
		69:13-18	Acushnet		109:9-10		
		72:14-15	Acushnet		109:17-110:1		
		74:4-9	Acushnet		110:8		
		74:16-18	Acushnet		110:20-111:4		
		74:21-75:5	Acushnet		115:11		
		75:12-16	Acushnet		115:13-15		
		76:5-14	Acushnet		115:19-116:9		
		78:5-16	Acushnet		132:6-13		
		79:6-80:3	Acushnet		135:16-19		
		80:09:00	Acushnet		135:22		
		80:19-21	Acushnet				
		81:2-6	Acushnet				
		81:12-20	Acushnet				

Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by Bridgestone	Objection	Acushnet's Reply Designations
		96:19-97:3	Acushnet				
		97:8-98:1	Acushnet				
		98:18-100:6	Acushnet				
		101:16-102:5	Acushnet				
		103:2-6	Acushnet				
		103:14-17	Acushnet				
		111:6-9	Acushnet				
		111:15-18	Acushnet				
		112:5-14:11	Acushnet				
		115:4-9	Acushnet				
		116:15-118:5	Acushnet				
		119:12:00	Acushnet				
		120:3-8	Acushnet				
		122:4-12	Acushnet				
		123:8-9	Acushnet				
		123:17-124:12	Acushnet				
		128:8-19	Acushnet				
		129:12-17	Acushnet				
		129:21-130:10	Acushnet				
		130:16-132:5	Acushnet				
		133:22-135:1	Acushnet				
9/22/2006	Atsushi Nanba	48:21-22	Acushnet		49:20-21		
		49:8-18	Acushnet		50:1-2		
		50:4-9	Acushnet		52:13-14		
		51:13-52:11	Acushnet		52:20-21		
		53:1-54:14	Acushnet		58:5-13		
		55:10-56:19	Acushnet		62:19-20		
		57:9-58:4	Acushnet		63:1-3		
		58:22-59:3	Acushnet		63:5-6		
		60:4-61:18	Acushnet		63:8		
		63:19-64:5	Acushnet		63:14-15		
		65:3-9	Acushnet		63:17		
		65:15-67:2	Acushnet		99:13-17		

Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by Bridgestone	Objection	Acushnet's Reply Designations
		73:12-74:4	Acushnet		107:13-14		
		77:22-83:15	Acushnet		110:8-11		
		85:2-86:15	Acushnet		110:14-16		
		87:3-88:3	Acushnet		110:18-20		
		99:5-12	Acushnet		111:6-9		
		100:5-102:6	Acushnet		111:11		
		102:8-107	Acushnet		111:13-15		
		107:15-109:18	Acushnet		119:7-120:4		
					120:6		
					120:8-11		
					120:22-121:4		
					121:7		
					121:9-11		
					121:14-16		
					121:18-122:1		
					122:4		
					122:6-13		
					122:15-16		
					122:18-21		
					123:2-4		
6/20/2006	Futoshi Otsuka	10:8-10	Acushnet		12:15-19		138:22-139:5
		12:7-9	Acushnet		13:7-9		
		12:20-13:5	Acushnet		27:10-12		
		25:6-9	Acushnet		28:20		
		27:1-9	Acushnet		31:22-32:10		
		28:14-19	Acushnet		33:20-34:11		
		29:4-6	Acushnet		34:14-19		
		30:21-31:1	Acushnet		41:5-14		
		32:11-33:18	Acushnet		42:14-43:9		
		41:15-42:6	Acushnet		43:17-22		
		43:11-16	Acushnet		65:16		
		65:12-14	Acushnet		65:20-66:6		
		66:8-13	Acushnet		71:9		

Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by Bridgestone	Objection	Acushnet's Reply Designations
		66:18-67:5	Acushnet		71:12-14		
		71:3-7	Acushnet		78:14-17		
		71:19-72:7	Acushnet		80:19-81:15		
		73:1-11	Acushnet		86:14-19		
		74:12-75:2	Acushnet		87:4-5		
		77:5-78:6	Acushnet		114:20-115:1		
		78:18-80:11	Acushnet		138:2-5		
		110:14-111:6	Acushnet		138:16-21		
		111:15-112:6	Acushnet		148:21-149:1		
		113:15-114:11	Acushnet		149:6-7		
		115:2-3	Acushnet				
		118:14-119:14	Acushnet				
		122:6-17	Acushnet				
		122:22-123:1	Acushnet				
		123:7-9	Acushnet				
		123:15-19	Acushnet				
		125:15-21	Acushnet				
		129:18-130:12	Acushnet				
		136:13-137:6	Acushnet				
		137:16-17	Acushnet				
		139:7-9	Acushnet				
11/2/2006	Timothy Rae	6:16-17	Acushnet		8:22-9:3		25:14-17
		8:10-14	Acushnet		14:2-14		36:15-37:3
		8:19-21	Acushnet		24:16-25:13		85:15-18
		11:3-12:20	Acushnet		34:14-36:36:14		
		16:3-9	Acushnet		71:20-72:7		
		16:15-17	Acushnet		83:22-85:14		
		16:20-17:3	Acushnet		110:3-111:17		
		17:9-16	Acushnet		112:13-114:10		
		17:22-18:2	Acushnet		117:17-118:10		
		18:8-9	Acushnet		118:23-121:5		
		20:-7-21:17	Acushnet		139:18-23		
		23:3-24	Acushnet				

Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by Bridgestone	Objection	Acushnet's Reply Designations
		30:1-20	Acushnet				
		31:1-32:11	Acushnet				
		32:19-22	Acushnet				
		34:6-13	Acushnet				
		38:1-5	Acushnet				
		38:13-16	Acushnet				
		38:21-25	Acushnet				
		40:15-21	Acushnet				
		52:17-53:25	Acushnet				
		55:17-56:12	Acushnet				
		60:12-22	Acushnet				
		61:6-8	Acushnet				
		62:17-22	Acushnet				
		64:19-25	Acushnet				
		71:17-19	Acushnet				
		72:8-12	Acushnet				
		85:23-86:7	Acushnet				
		109:24-110:2	Acushnet				
		111:24-112:12	Acushnet				
		117:7-16	Acushnet				
		118:11-22	Acushnet				
		123:10-128:8	Acushnet				
		134:11-24	Acushnet				
		135:10-23	Acushnet				
		136:13-139:3	Acushnet				
	Hirofaka Shimosaka	6:2-10:22	Acushnet		24:21-26:5		34:4-9
9/13/2006		14:10-17:9	Acushnet		28:6-7		
		21:1-23:3	Acushnet		28:22-29:1		
		23:9-24:20	Acushnet		29:10		
		27:16-28:5	Acushnet		29:15-30:8		
		28:8-28:21	Acushnet		30:13-14		
		29:2-29:9	Acushnet		31:2-4		

Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by Bridgestone	Objection	Acushnet's Reply Designations
		29:11-29:14	Acushnet		31:9-10		
		30:9-30:12	Acushnet		32:22-33:1		
		30:15-31:1	Acushnet		33:12-34:1		
		31:5-31:8	Acushnet		34:11-35:4		
		31:11-32:21	Acushnet		36:20-37:1		
		33:2-33:11	Acushnet		39:2-9		
		35:5-36:19	Acushnet		41:2-4		
		38:2-39:2	Acushnet		42:4-17		
		39:10-40:14	Acushnet		48:5-14		
		41:5-42:3	Acushnet		48:21-49:4		
		43:1-44:1	Acushnet		56:1-9		
		44:5-48:4	Acushnet		56:21-57:10		
		48:15-48:20	Acushnet		62:8-19		
		49:5-54:8	Acushnet		68:22		
		(Removed 52:1-17)	Acushnet		89:9-11		
		56:1-20	Acushnet		104:17-105:5		
		57:11-62:7	Acushnet		111:11-18		
		64:10-65:1	Acushnet		115:18-116:19		
		65:19-68:21	Acushnet		117:2-15		
		69:1-69:12	Acushnet		132:6-11		
		70:2-79:2	Acushnet				
		80:6-82:13	Acushnet				
		83:4-84:12	Acushnet				
		85:2-88:22	Acushnet				
		89:11-90:6	Acushnet				
		90:16-98:3	Acushnet				
		98:8-104:16	Acushnet				
		105:6-111:10	Acushnet				
		111:19-112:4	Acushnet				
		112:11-115:17	Acushnet				
		116:20-117:1	Acushnet				
		117:16-132:5	Acushnet				

Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by Bridgestone	Objection	Acushnet's Reply Designations
9/14/2006	Hirofaka Shimosaka	148:8-148:17	Acushnet		147:22-148:7		152:14-159:4
		149:7-149:14	Acushnet		148:18-149:6		167:21-170:15
		159:6-160:10	Acushnet		150:2-19		215:8-223:18
		160:20-167:13	Acushnet		160:11-19		228:11-229:13
		171:9-173:16	Acushnet		167:14-20		274:13-277:5
		174:9-195:20	Acushnet		173:17-174:8		
		196:9-208:17	Acushnet		208:18-209:17		
		209:18-214:21	Acushnet		214:9-20		
		(Removed 214:21:00)	Acushnet		224:4-14		
		223:19-224:3	Acushnet		224:21-22		
		225:1-225:6	Acushnet		225:7-226:1		
		226:2-228:10	Acushnet		229:14-18		
		232:2-234:2	Acushnet		229:20-22		
		235:2-237:11	Acushnet		230:1		
		237:16-244:1	Acushnet		230:3-4		
		244:11-245:10	Acushnet		230:6		
		245:20-249:1	Acushnet		230:8-231:22		
		249:10-249:17	Acushnet		234:3-12		
		249:22-250:4	Acushnet		245:11-17		
		250:18-251:21	Acushnet		249:18-21		
		254:2-255:9	Acushnet		250:5-17		
		256:10-273:12	Acushnet		250:22-254:1		
		274:5-274:12	Acushnet		255:10-256:1		
		277:6-279:19	Acushnet		273:13-274:4		
		280:8-281:16	Acushnet		279:20-280:7		
		282:11-283:19	Acushnet		281:17-282:9		
9/15/2006	Hirofaka Shimosaka	10:11-11:15	Acushnet		8:13-10:10		11:17-12:3
		13:8-14:11	Acushnet		12:4-13:7		
					14:12-15:22		

Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by Bridgestone	Objection	Acushnet's Reply Designations
9/15/2006	Hirotsuka Shimosaka	304:15-305:11	Acushnet		304:13-14		319:14-320:11
		305:19-306:2	Acushnet		305:12-18		393:18-394:1
		306:7-307:5	Acushnet		306:3-6		
		307:16-309:10	Acushnet		307:6-15		
		310:2-317:2	Acushnet		309:11-310:1		
		317:16-318:8	Acushnet		318:19-319:13		
		320:12-320:15	Acushnet		320:16-21		
		320:22-321:11	Acushnet		321:12-17		
		321:18-323:20	Acushnet		323:21-324:12		
		324:13-334:18	Acushnet		354:11-21		
		335:8-342:8	Acushnet		359:16-361:6		
		343:15-354:10	Acushnet		371:11-372:14		
		354:22-359:2	Acushnet		373:16-19		
		361:7-371:10	Acushnet		378:11-380:19		
		372:15-373:15	Acushnet		385:10-386:5		
		373:20-378:10	Acushnet		391:21-393:5		
		380:20-385:9	Acushnet		394:3-395:6		
		387:7-390:19	Acushnet				
		391:5-391:20	Acushnet				
		395:7-398:8	Acushnet				
11/16/2006	Hirotsuka Shimosaka	11:11-12:18	Acushnet		12:19-13:2		
		13:3-13:10	Acushnet		13:11-12		
		13:13-14:4	Acushnet		14:5-6		
		14:7-14:14	Acushnet		14:15-19		
		14:20-15:14	Acushnet		15:15-16		
		15:17-16:1	Acushnet		16:2-3		
		16:4-17:20	Acushnet		17:21-22		
		18:1-18:6	Acushnet		18:7-8		
		18:9-18:16	Acushnet		18:17-18		
		18:19-20:16	Acushnet		20:17-18		
		20:19-21:22	Acushnet		22:1-2		

Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by Bridgestone	Objection	Acushnet's Reply Designations
		22:3-22:10	Acushnet		22:11		
		22:13-23:15	Acushnet		23:16-18		
		23:19-24:13	Acushnet		24:14-15		
		24:16-25:9	Acushnet		25:10-26:16		
		26:17-29:20	Acushnet		30:10-12		
		30:7-30:9	Acushnet		35:8-13		
		30:12-35:7	Acushnet		39:5-18		
		35:14-39:4	Acushnet		40:11-12		
		39:19-40:10	Acushnet		43:11-12		
		40:13-43:10	Acushnet		46:15-16		
		43:13-46:14	Acushnet		47:8-17		
		46:17-47:7	Acushnet		48:16-17		
		47:18-48:15	Acushnet		49:2-3		
		48:18-49:1	Acushnet		49:12-16		
		49:4-49:11	Acushnet		49:22		
		49:17-49:21	Acushnet		50:14-15		
		50:1-50:13	Acushnet		50:22-51:1		
		50:16-50:21	Acushnet		53:17-18		
		51:2-53:16	Acushnet		54:21-22		
		53:19-54:20	Acushnet		56:15-16		
		55:1-56:14	Acushnet		57:4		
		56:17-57:3	Acushnet		57:12-13		
		57:5-57:11	Acushnet		58:11-59:19		
		57:14-58:10	Acushnet		60:13-14		
		59:20-60:12	Acushnet		62:16-17		
		60:15-62:15	Acushnet		62:22-63:1		
		62:18-62:21	Acushnet		64:2-20		
		63:2-64:1	Acushnet		65:19-20		
		64:21-65:18	Acushnet		66:7-8		
		65:21-66:6	Acushnet		67:2-3		
		66:9-67:1	Acushnet		73:22-74:1		
		67:4-69:19	Acushnet		74:16-17		
		70:6-73:21	Acushnet		76:4-5		
		74:2-74:15	Acushnet		79:9-14		

Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by Bridgestone	Objection	Acushnet's Reply Designations
		74:18-76:3	Acushnet		86:20-87:1		
		76:6-79:8	Acushnet		91:14-92:9		
		79:18-82:22	Acushnet		97:7-8		
		83:2-83:14	Acushnet		98:04:00		
		84:5-86:19	Acushnet		103:5-13		
		87:2-91:13	Acushnet		104:13-105:4		
		92:10-97:6	Acushnet				
		97:9-98:3	Acushnet				
		98:5-99:17	Acushnet				
		100:6-103:4	Acushnet				
		103:14-104:12	Acushnet				
	Hirofaka Shimosaka	6:14-8:15	Acushnet		8:16		
11/17/2006		8:17-9:3	Acushnet		9:4-18		
		9:19-13:6	Acushnet		13:7-8		
		13:9-13:20	Acushnet		13:21		
		13:22-15:8	Acushnet		15:9-11		
		15:12-16:2	Acushnet		16:03		
		16:5-18:13	Acushnet		21:13-14		
		18:16-20:1	Acushnet		22:12-14		
		20:11-21:12	Acushnet		23:7-8		
		21:15-22:11	Acushnet		23:20-21		
		22:15-23:6	Acushnet		24:13-14		
		23:9-23:19	Acushnet		24:19-20		
		23:22-24:12	Acushnet		25:18-27:11		
		24:15-24:18	Acushnet		28:20-22		
		24:21-24:22	Acushnet		29:7-8		
		25:3-25:17	Acushnet		29:16-17		
		27:12-28:19	Acushnet		31:9-10		
		29:1-29:6	Acushnet		33:19-22		
		29:9-29:15	Acushnet		34:16-18		
		29:18-30:18	Acushnet		39:1-2		
		31:6-31:8	Acushnet		41:22		

Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by Bridgestone	Objection	Acushnet's Reply Designations
		31:11-32:13	Acushnet		42:22-43:1		
		32:20-33:18	Acushnet		45:22-46:15		
		34:2-34:15	Acushnet		46:22-47:1		
		34:20-38:22	Acushnet		47:17-48:2		
		39:3-40:10	Acushnet		48:14-49:20		
		40:16-41:21	Acushnet		50:2-3		
		42:1-42:21	Acushnet		51:9-18		
		43:2-45:21	Acushnet		53:13-16		
		46:16-46:21	Acushnet		54:8-9		
		47:2-47:16	Acushnet		55:8-9		
		48:3-48:13	Acushnet		56:5-12		
		49:21-50:1	Acushnet		57:7-9		
		50:4-51:8	Acushnet		57:19-21		
		51:19-52:3	Acushnet		58:11-59:6		
		52:14-53:12	Acushnet		59:12-13		
		53:18-54:7	Acushnet		64:12-13		
		54:10-55:7	Acushnet		64:21-22		
		55:10-56:4	Acushnet		65:8		
		56:13-57:6	Acushnet		80:15-81:8		
		57:11-57:18	Acushnet		82:22-83:1		
		58:1-58:3	Acushnet		83:14-84:14		
		58:6-58:10	Acushnet		91:2-14		
		59:7-59:11	Acushnet		91:19-20		
		59:14-64:1	Acushnet		93:8-9		
		64:4-64:11	Acushnet		100:12-13		
		64:14-64:20	Acushnet				
		65:1-65:7	Acushnet				
		65:9-66:1	Acushnet				
		66:17-76:11	Acushnet				
		76:17-78:8	Acushnet				
		78:14-79:18	Acushnet				
		80:1-80:14	Acushnet				
		81:9-81:13	Acushnet				
		81:19-82:21	Acushnet				

Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by Bridgestone	Objection	Acushnet's Reply Designations
		83:2-83:13	Acushnet				
		84:15-85:13	Acushnet				
		86:2-88:21	Acushnet				
		89:5-90:8	Acushnet				
		90:14-91:1	Acushnet				
		91:16-91:18	Acushnet				
		91:21-93:7	Acushnet				
		93:10-93:12	Acushnet				
		93:21-98:21	Acushnet				
		99:2-100:11	Acushnet				
		100:14-101:4	Acushnet				
9/28/2006	Jun Shindo	32:1-33:7	Acushnet		23:21-24:10		27:13-27:21; 28:21-
		36:10-19	Acushnet		31:16-22		30:12; 31:3-31:15
		37:6-9	Acushnet		33:8-34:1		34:02-34:02
		42:14-43:9	Acushnet		35:4-36:9		45:22:00
		45:2-21	Acushnet		37:10-38:9		51:21:00
							63:6-63:13
		46:1-47:15	Acushnet		47:16-49:20		65:18-67:5; 71:20-
		51:3-20	Acushnet		54:8-55:7		72:4
		52:1-8	Acushnet		60:1-62:12		65:18-66:20
		54:1-7	Acushnet		63:15-64:17		
		55:8-59:21	Acushnet		67:6-69:16		
		62:13-18	Acushnet				
		64:18-65:20	Acushnet				
		65:1-11	Acushnet				
		72:14-22	Acushnet				
		73:1-7	Acushnet				
		74:10-21	Acushnet				
9/29/2006	Jun Shindo	89:21-90:1	Acushnet		92:17-96:5		90:2; 90:22-91:3
		91:4-92:16	Acushnet		100:7-103:1		96:21-97:2; 103:14-17; 104:16-105:2

Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by Bridgestone	Objection	Acushnet's Reply Designations
		96:6-20	Acushnet		110:13-20		123:12-125:2; 126:12-127:11
		97:3-101:6	Acushnet		111:10-115:1		
		105:9-109:7	Acushnet		129:3-130:3		
		130:4-22	Acushnet		131:1-22		
		132:1-16	Acushnet		132:17-133:3		
		133:14-134:20	Acushnet		138:15-139:11		
		139:13-17	Acushnet				
	Kazuyuki Takahashi	9:19-10:1	Acushnet		173-18:10		16:9-21
8/22/2006		16:22-17:2	Acushnet		82:10-83:16		18:11-13
		74:6-9	Acushnet		84:5-12		84:13 - 85:18
		75:7-10	Acushnet		87:9-21		89:17 - 90:7
		82:1-9	Acushnet		96:17-98:2		92:16 - 93:6
		83:17-84:4	Acushnet		99:1-14		94:19 - 95:2
		84:13-85:9	Acushnet		106:4-109:20		98:3-18
		90:20-92:15	Acushnet		124:5-13		100:9-14
		95:3-22	Acushnet		127:16-19		100:21-101:3
		96:9-16	Acushnet		127:22-128:21		101:17-21
		122:22-123:4	Acushnet				105:2-16
		127:7-15	Acushnet				123:15 - 124:3
		127:20-21	Acushnet				124:14-17
	Kazuyuki Takahashi	13:6-21	Acushnet		12:9-13:5		7:22 - 8:7
8/23/2006		14:6-9	Acushnet		13:22-14:5		9:11 - 10:15
		17:4-8	Acushnet		17:9-18:11		11:13 - 12:8
		18:12-19:6	Acushnet		20:5-11		14:10-19
		19:21-20:4	Acushnet		25:15-26:19		15:11-14
		20:12-21:7	Acushnet		28:11-15		31:21-32:3
		28:3-10	Acushnet		29:19-21		84:9-15
		28:16-18	Acushnet		31:11-20		

Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by Bridgestone	Objection	Acushnet's Reply Designations
		29:11-18	Acushnet		32:8-15		
		29:22-30:17	Acushnet		34:17-20		
		32:4-7	Acushnet		36:6-38:16		
		32:16-33:4	Acushnet		44:8-45:16		
		33:17:00	Acushnet		46:12-21		
		34:15-16	Acushnet		47:2-7		
		35:6-36:5	Acushnet		54:11-20		
		38:17-39:4	Acushnet		61:8-17		
		41:18-44:7	Acushnet		64:16-67:10		
		46:22-47:1	Acushnet		68:15-19		
		47:8-19	Acushnet		70:16-71:22		
		48:7-11	Acushnet		74:15-75:4		
		53:19-54:10	Acushnet		75:8-77:5		
		54:21-55:7	Acushnet		79:22-80:12		
		57:3-19	Acushnet		80:20-84:8		
		58:11-60:1	Acushnet		92:13-93:15		
		60:15-61:7	Acushnet		108:20-110:2		
		61:18-22	Acushnet		11:3-18		
		62:8-21	Acushnet		112:8-14		
		64:12-15	Acushnet		113:2-22		
		74:3-14	Acushnet		114:13-115:21		
		75:5-7	Acushnet				
		78:4-16	Acushnet				
		80:13-19	Acushnet				
		85:2-86:16	Acushnet				
		89:5-8	Acushnet				
		89:13-91:13	Acushnet				
		107:11-16	Acushnet				
		108:2-19	Acushnet				
		110:3-111:2	Acushnet				
		111:19-112:7	Acushnet				
		112:15-113:1	Acushnet				
		114:1-12	Acushnet				

Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by Bridgestone	Objection	Acushnet's Reply Designations
9/26/2006	Seisuke Tomita	9-6-1:12	Acushnet		9-3-5		44:10-15
		14:1-17:12	Acushnet		11:3-13		60:3-8
		45:11-52:9	Acushnet		11:21-12:20		60:20 - 61:15
		68:17-69:7	Acushnet		67:8-68:15		89:3-11
		73:11-18	Acushnet		71:4-14		103:9-104:9
		75:2-75:17	Acushnet		72:1-22		114:7-12
		76:8-76:15	Acushnet		84:8-85:3		
		76:21-77:19	Acushnet		88:15-89:2		
		79:10-83:14	Acushnet		89:12-15		
		84:2-84:7	Acushnet		102:11-103:8		
		87:22-88:14	Acushnet		104:10-106:6		
		91:2-96:20	Acushnet		114:1-6		
		96:21-98:1	Acushnet				
		98:2-98:19	Acushnet				
		100:10-102:10	Acushnet				
		106:8-113:22	Acushnet				
		116:7-120:8	Acushnet				
9/27/2006	Seisuke Tomita	139:17-142:7	Acushnet		138:12-139:16		135:7 - 136:6
		148:20-151:10	Acushnet		142:8-145:8		
		153:20-155:13	Acushnet		146:21-148:12		
		163:4-167:3	Acushnet		156:1-3		
		171:19-179:7	Acushnet		156:5-9		
					167:5-22		
9/15/2006	Peter Voorheis	12:12-15	Acushnet		54:17-55:5		47:13-49:10
		47:4-12	Acushnet		58:17-22		55:6-58:16
		59:7-13	Acushnet		59:14-60:12		59:1-6
		69:15-70:21	Acushnet		70:22-71:9		60:13-61:8
		74:5-75:22	Acushnet		73:7-17		71:10-73:6
		76:10-84:22	Acushnet		88:18-89:17		76:1-9
		88:10-17	Acushnet		92:20-93:21		85:10-88:5
		89:18-20	Acushnet		94:15-22		93:22-94:14
		90:8-9	Acushnet		97:14-20		95:1-97:1

Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by Bridgestone	Objection	Acushnet's Reply Designations
		90:17-91:12	Acushnet		102:2-15		98:12-18
		92:5-12	Acushnet		105:1-11		98:22-99:13
		92:18-19	Acushnet		106:12-107:5		103:7-104:22
		97:2-14	Acushnet		108:17-22		108:2-6
		97:21-22	Acushnet		111:5-12		126:1-7
		98:7-12	Acushnet		111:20-112:13		140:15-141:18
		98:19-21	Acushnet		116:19-117:17		146:6-148:10
		99:14-21	Acushnet		118:2-125:22		151:21-155:7
		100:16-101:13	Acushnet		126:8-137:22		158:5-160:12
		102:16-20	Acushnet		139:15-140:14		161:11-15
		103:04-00	Acushnet		145:12-146:5		162:21-163:16
		105:12-106:11	Acushnet		148:11-14		164:4-12
		109:4-111:4	Acushnet		155:8-156:18		168:3-171:16
		111:13-19	Acushnet		157:8-158:3		180:13-181:6
		114:8-116:7	Acushnet		160:13-161:10		240:15-241:1
		116:13-18	Acushnet		161:16-162:20		243:9-20
		117:18-118:1	Acushnet		167:7-168:2		253:14-254:21
		138:11-139:14	Acushnet		173:10-176:19		279:12-21
		144:9-145:11	Acushnet		180:3-13		286:7-288:5
		163:17-164:3	Acushnet		181:7-182:7		289:19-291:15
		171:17-19	Acushnet		214:11-215:10		293:7-19
		172:7-17	Acushnet		241:7-243:8		320:4-326:19
		179:8-180:2	Acushnet		252:14-253:13		
		182:8-21	Acushnet		288:6-289:18		
		182:8-186:4	Acushnet		315:17-316:2		
		189:19-189:20	Acushnet		316:6-317:3		
		190:1-199:20	Acushnet		319:3-320:3		
		211:4-214:10	Acushnet		326:20-330:9		
		235:1-237:2	Acushnet				
		243:21-245:11	Acushnet				
		248:5-11	Acushnet				
		249:10-18	Acushnet				
		297:6-298:17	Acushnet				
		314:8-315:6	Acushnet				

Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by Bridgestone	Objection	Acushnet's Reply Designations
8/24/2006	Hideo Watanabe	7:11-15	Acushnet		13:6-14:3		16:8-18
		8:3-9:10	Acushnet		16:22-17:5		37:6-17
		17:6-18:5	Acushnet		32:18-20		67:1-11
		26:3-32:17	Acushnet		36:3-7		69:10-16
		35:22-36:2	Acushnet		37:22-38:11		78:11-15
		36:18-37:5	Acushnet		42:10-22		82:14-15
		40:12-17	Acushnet		43:14-19		86:22-82:7
		41:2-10	Acushnet		46:9-16		104:20-21
		41:22-42:9	Acushnet		48:14-16		105:4-12
		43:10-13	Acushnet		49:8-11		
		43:20-46:8	Acushnet		50:1-2		
		46:17-19	Acushnet		70:11-14		
		48:8-13	Acushnet		71:1-3		
		48:18-49:7	Acushnet		71:8-9		
		49:12-22	Acushnet		71:19-72:1		
		50:14-20	Acushnet		72:7-13		
		51:3-14	Acushnet		73:8-10		
		53:14-22	Acushnet		73:16-74:2		
		55:16-66:15	Acushnet		74:4-16		
		69:20-70:10	Acushnet		75:14-20		
		70:15-22	Acushnet		76:4-8		
		71:5-7	Acushnet		78:7-10		
		71:10-18	Acushnet		78:16-79:3		
		72:2-6	Acushnet		82:9-13		
		72:14-73:7	Acushnet		83:1-17		
		73:11-15	Acushnet		84:7-11		
		74:03-00	Acushnet		86:11-15		
		74:17-75:13	Acushnet		86:20-21		
		75:21-76:3	Acushnet				
		76:19-78:6	Acushnet				
		80:17-81:6	Acushnet				
		81:12-21	Acushnet				
		82:16-22	Acushnet				

Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by Bridgestone	Objection	Acushnet's Reply Designations
		84:3-6	Acushnet				
		84:12-20	Acushnet				
		85:15-86:10	Acushnet				
		88:17-91:11	Acushnet				
		102:14-103:6	Acushnet				
		103:19-104:10	Acushnet				
		123:22-125:6	Acushnet				
		125:18-126:10	Acushnet				
8/25/2006	Hideo Watanabe	149:13-14	Acushnet		149:15-17		167:10 - 13
		162:16-163:4	Acushnet		164:17-165:1		170:2-14
		163:18-164:16	Acushnet		167:16-18		171:1-10
		166:12-18	Acushnet		168:1-9		172:16 - 173:6
		167:10-15	Acushnet		169:5-170:1		180:4-7
		168:14-15	Acushnet		170:15-22		184:7-11
		168:19-169:3	Acushnet		171:19-172:15		190:1 - 192:6
		173:20-174:5	Acushnet		174:6-19		195:15-17
		174:20-175:2	Acushnet		176:4-5		205:16-20
		175:19-176:3	Acushnet		176:15-177:7		206:15 - 207:7
		176:10-14	Acushnet		179:10-13		208:6 - 210:11
		177:9-12	Acushnet		179:17-180:3		213:19 - 214:5
		179:6-9	Acushnet		184:1-6		
		184:12-21	Acushnet		195:8-14		
		185:2-189:22	Acushnet		211:4-11		
		192:7-22	Acushnet		211:16-18		
		193:15-194:5	Acushnet		212:7-8		
		194:20-195:7	Acushnet		214:11-12		
		205:14	Acushnet		214:17-20		
		205:8-9	Acushnet		234:22-235:4		
		205:12-15	Acushnet				
		205:21-206:5	Acushnet				
		210:12-211:3	Acushnet				
		211:12-15	Acushnet				
		211:19-212:6	Acushnet				

Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by Bridgestone	Objection	Acushnet's Reply Designations
		212:9-22	Acushnet				
		213:14-18	Acushnet				
		214:6-10	Acushnet				
		214:13-16	Acushnet				
		214:21-215:6	Acushnet				
		234:1-21	Acushnet				
		254:15-20	Acushnet				
		255:19-256:13	Acushnet				
10/3/2006	Hishashi Yamagishi	4:12-21	Acushnet		10:22		13:12-15
		10:10-21	Acushnet		13:16-14:5		18:18 - 19:1
		11:10-12:14	Acushnet		20:8-17		19:16 - 20:7
		13:6-11	Acushnet		21:3-15		21:17 - 22:2
		24:10-22	Acushnet		22:4-12		23:6-12
		27:5-28:7	Acushnet		25:1-27:4		29:10-15
		29:10-15	Acushnet		28:14-29:9		39:10-19
		31:19-32:2	Acushnet		29:16-31:18		60:15-17
		34:1-9	Acushnet		32:3-33:22		
		41:17-43:1	Acushnet		34:10-16		
		46:10-48:9	Acushnet		39:20-41:16		
		48:19-49:16	Acushnet		45:17-46:9		
		50:19-51:12	Acushnet		48:10-18		
		51:20-22	Acushnet		50:5-18		
		52:8-53:17	Acushnet		51:13-19		
		54:5-11	Acushnet		52:1-7		
		54:20-55:16	Acushnet		53:18-54:4		
		56:18-57:1	Acushnet		54:12-19		
		57:15-22	Acushnet		55:17-56:17		
		62:6-12	Acushnet		57:2-14		
		64:2-16	Acushnet		58:1-5		
		66:16-67:17	Acushnet		61:4-62:5		
		68:01:00	Acushnet		62:13-64:1		
		68:6-13	Acushnet		64:17-66:15		
		68:21-69:9	Acushnet		67:18-22		

Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by Bridgestone	Objection	Acushnet's Reply Designations
		94:17-21	Acushnet		68:2-5		
		95:7-96:8	Acushnet		68:14-20		
		97:2-98:19	Acushnet		69:10-20		
		100:4-7	Acushnet		89:20-94:16		
					96:9-97:1		
					98:20-100:3		
10/4/2006	Hishashi Yamagishi	108:20-109:18	Acushnet		109:19-110:14		130:9-15
		110:15-20	Acushnet		110:21-112:6		146:5-8
		112:7-15	Acushnet		112:16-114:15		168:17-20
		114:16-20	Acushnet		114:21-115:4		
		115:5-15	Acushnet		115:16-116:2		
		116:3-118:15	Acushnet		118:16-119:19		
		119:20-121:16	Acushnet		121:17-125:17		
		125:18-128:1	Acushnet		128:2-21		
		131:22-132:16	Acushnet		131:16-21		
		134:19-135:13	Acushnet		132:17-134:12		
		136:5-11	Acushnet		135:14-136:4		
		137:21-22	Acushnet		136:12-137:20		
		138:05:00	Acushnet		138:1-4		
		139:4-19	Acushnet		138:6-139:3		
		140:16-141:8	Acushnet		139:20-140:15		
		141:18-143:12	Acushnet		141:9-17		
		144:15-145:7	Acushnet		143:13-144:14		
		145:15-146:8	Acushnet		145:8-14		
		148:16-149:3	Acushnet		146:9-148:15		
		150:4-151:6	Acushnet		149:4-150:3		
		162:15-163:3	Acushnet		163:4-19		
		163:20-164:11	Acushnet		168:21-169:11		
		169:12-20	Acushnet		169:21-171:17		
		171:18-172:6	Acushnet		172:7-173:18		
		173:19-174:14	Acushnet		174:15-175:9		
		175:10-177:4	Acushnet				

Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by Bridgestone	Objection	Acushnet's Reply Designations
9/19/2006	Tadatoshi Yamada	10:3-6	Acushnet		18:20-24:10		17:21
		17:22-18:19	Acushnet		26:21-27:7		31:9-12
		24:11-16	Acushnet		29:6-10		47:7-16
		27:8-29:5	Acushnet		34:2-36:20		51:21 - 52:6
		32:12-34:1	Acushnet		37:19-38:12		65:3-4
		38:13-39:3	Acushnet		41:18-42:8		71:16 - 72:1
		39:21-40:6	Acushnet		43:19-44:10		80:2-13
		42:9-43:18	Acushnet		46:17-47:6		86:7-12
		44:11-16	Acushnet		47:17-48:8		101:22 - 102:6
		46:6-16	Acushnet		51:16-20		114:10-13
		57:21-58:10	Acushnet		58:11-61:22		116:20 - 117:2
		83:18-84:13	Acushnet		62:22-63:6		133:2-4
		89:9-20	Acushnet		63:18-64:7		150:2-5
		96:15-100:1	Acushnet		64:11-17		
		101:18-20	Acushnet		66:14-68:20		
		108:21-109:6	Acushnet		71:11-15		
		110:6-113:22	Acushnet		72:4-15		
		116:14-19	Acushnet		84:14-86:5		
		121:16-122:2	Acushnet		100:3-10		
		123:13-19	Acushnet		115:18-116:13		
		134:1-136:1	Acushnet		122:3-16		
		137:10-138:6	Acushnet		133:5-7		
		139:18-140:5	Acushnet		140:6-15		
		150:20-152:15	Acushnet		160:8-12		
		155:2-22	Acushnet		160:19-22		
		157:4-158:19	Acushnet		162:18-163:6		
		159:15-160:7	Acushnet				
		160:13-18	Acushnet				
					9:15-11:10		
8/30/2006	Yoshinori Egashira	11:11-12	Acushnet		11:13-17		
		11:18-12:7	Acushnet		13:9-16:20		
		16:21-17:22	Acushnet		18:1-20:4		
		26:15-18	Acushnet		26:9-14		

Date of Deposition	Deponent	Original Designation	Party Making Original Designation	Objection	Counter-Designation by Bridgestone	Objection	Acushnet's Reply Designations
		26:22-27:4	Acushnet		26:19-21		
		28:14-16	Acushnet		27:5-28:13		
		29:4-5	Acushnet		28:17-29:3		
		29:11-16	Acushnet		29:6-10		
		30:4-6	Acushnet		29:17-30:3		
		31:14-32:12	Acushnet		30:7-31:13		
		33:6-10	Acushnet		32:13-33:5		
					38:13-39:5		
10/2/2006	Yoshinori Egashira	39:6-14	Acushnet		39:15		
		39:16-40:2	Acushnet		40:3-7		
		40:8-13	Acushnet		40:14-17		
		40:18-22	Acushnet		42:2		
		41:22-42:1	Acushnet		42:11-12		
		42:3-10	Acushnet		42:17-18		
		42:13-16	Acushnet		46:19-48:19		
		42:19-20	Acushnet		49:3-4		
		48:20-49:2	Acushnet				
		49:5-7	Acushnet				

# EXHIBIT 12

**EXHIBIT 12**

**BRIEF STATEMENT OF WHAT BRIDGESTONE INTENDS TO PROVE**

1. Bridgestone intends to prove in support of its claims, in addition to the facts not in dispute, including the damages claimed, and other relief sought as follows:

a. Bridgestone intends to prove that Acushnet infringes the '852 patent by making, selling and using the accused Acushnet golf balls, literally or under the doctrine of equivalents.

b. Bridgestone intends to prove that Acushnet infringes the '707 patent by making, selling and using the accused Acushnet golf balls, literally or under the doctrine of equivalents.

c. Bridgestone intends to prove that Acushnet infringes the '791 patent by making, selling and using the accused Acushnet golf balls, literally or under the doctrine of equivalents.

d. Bridgestone intends to prove that Acushnet infringes the '652 patent by making, selling and using the accused Acushnet golf balls, literally or under the doctrine of equivalents.

e. Bridgestone intends to prove that Acushnet infringes the '961 patent by making, selling and using the accused Acushnet golf balls, literally or under the doctrine of equivalents.

f. Bridgestone intends to prove that Acushnet infringes the '817 patent by making, selling and using the accused Acushnet golf balls, literally or under the doctrine of equivalents.

g. Bridgestone intends to prove that Acushnet infringes the '834 patent by making, selling and using the accused Acushnet golf balls, literally or under the doctrine

of equivalents.

h. Bridgestone intends to prove the amount of damages it has suffered from Acushnet's infringement of the Bridgestone patents-in-suit, including reasonable royalties in the amounts set forth in the Expert Report of John C. Jarosz dated January 16, 2007.

i. Bridgestone intends to prove that it is entitled to enhanced damages, attorneys' fees and costs under 35 U.S.C. §§ 284 and 285.

j. Bridgestone intends to prove that it is entitled to a permanent injunction prohibiting Acushnet from further infringement the Bridgestone patents-in-suit.

k. Bridgestone intends to rebut, to the extent necessary, any defense offered by Acushnet in its case-in-chief.

# EXHIBIT 13

**EXHIBIT 13****ACUSHNET'S STATEMENT OF INTENDED PROOF<sup>1</sup>****I. INTRODUCTION TO ACUSHNET**

Acushnet Company is the leading manufacturer of golf balls in the United States and the world. It is an innovator in the art, not just a “wound ball” company as claimed by Bridgestone, and it protects and respects intellectual property rights and did not copy the patent-in-suits. Acushnet created its own products and obtained its own patents on the accused balls. Acushnet has even designed around some of Bridgestone’s patents. Bridgestone’s patents-in-suit did not invent the “long and soft” solid golf ball or the idea of a double cover solid golf ball. Professionals prefer Pro V1 on tour to competing balls, for reasons having nothing to do with any alleged technology of Bridgestone’s.

**II. BRIDGESTONE'S PATENTS****A. U.S. Patent No. 5,252,652**

1. The Asserted Claims are invalid because they are anticipated under 35 U.S.C. § 102, in light of at least the Fujii Japanese Kokai Publication No. 02-092378.
2. The Asserted Claims are invalid because they are obvious under 35 U.S.C. §103, in light of at least the following prior art references:
  - Fujii Japanese Kokai Publication No. 02-092378
  - U.S. Patent No. 4,556,220
  - H. Fries et al, Mastication of Rubber (1981)
  - U.S. Patent No. 4,722,977
  - Knowledge of one of ordinary skill in the art

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<sup>1</sup> Acushnet has excluded from this Statement of Intended Proof reliance on prior art that the Court has ruled Acushnet may not rely upon at trial. (*See* D.I. 288, 291 (orders addressing prior art related to the ‘707 and ‘791 patents)). But in so doing Acushnet has not intended to abandon or waive any right to appeal from an adverse judgment following trial the issues relating to the Court’s exclusion rulings.

- Other art identified by Acushnet in its discovery responses.

3. In proving obviousness, Acushnet will provide evidence to determine the scope and content of the prior art and ascertain the differences between the prior art and the claims.

4. None of Acushnet's Accused Products practice any of the Asserted Claims of the '652 patent because they lack one or more claim element(s) including, but not limited to, the following:

- "a rubber composition containing 100 parts by weight of a base rubber selected from the group consisting of polybutadiene rubber, natural rubber, polyisoprene rubber and styrene-butadiene rubber"
- "about 25 to about 40 parts by weight of a zinc or magnesium salt of an unsaturated fatty acid having 3 to 8 carbon atoms"
- "about 0.05 to about 2 parts by weight of a sulfur compound selected from the group consisting of pentachlorothiophenol, 4-t-butyl-o-thiocresol, 4-t-butyl-p-thiocresol, 2-benzamidothiophenol, thiobenzoic acid, and zinc salts thereof"

5. Bridgestone cannot prove that the '652 patent is entitled to rely on its Japanese foreign filing date for priority purposes.

6. The addition of new matter during the prosecution of the '652 patent results in the '652 patent having a priority date of May 10, 1990.

7. Bridgestone is barred from attempting to prove infringement under the doctrine of equivalents because of prosecution history estoppel.

#### **B. U.S. Patent No. 5,553,852**

1. The Asserted Claims are invalid because they are anticipated under 35 U.S.C. § 102, in light of at least the U.S. Patent No. 4,431,193 to Nesbitt issued on February 14, 1984, based on an application filed August 25, 1981.

2. The Asserted Claims are invalid because they are obvious under 35 U.S.C. §103, in light of at least the following prior art references:

- U.S. Patent No. 4,431,193
- U.S. Patent No. 5,314,187
- The Wilson Ultra Tour Balata 90 Golf Ball manufactured and sold by Wilson Sporting Goods and obtained by Acushnet prior to July 1993 and stored under log number 93007.
- Knowledge of one of ordinary skill in the art
- Other art identified by Acushnet in its discovery responses.

3. In proving obviousness, Acushnet will provide evidence to determine the scope and content of the prior art and ascertain the differences between the prior art and the claims.

4. None of Acushnet's Accused Products practice any of the Asserted Claims of the '852 patent because they lack one or more claim element(s) including, but not limited to, the following:

- "a three-piece solid golf ball"
- "said center core having a diameter of at least 29 mm"
- "said intermediate layer having a thickness of at least 1 mm"
- "said cover having a thickness of 1 to 3 mm"

5. Further, the inventor expressly disavowed golf balls, such as the Accused Products, during the prosecution of the '852 patent.

6. Allowing Bridgestone to pursue infringement under the doctrine of equivalents would result in Bridgestone improperly recapturing intentionally excluded subject matter. For at least this reason, Bridgestone should be precluded from pursuing infringement under the doctrine of equivalents.

**C. U.S. Patent No. 6,634,961**

1. The Asserted Claim is invalid because it is anticipated under 35 U.S.C. § 102, in light of at least U.S. Patent 6,612,940 to Nesbitt issued on September 2, 2003, based on an application filed on November 9, 2000 claiming priority to a provisional application filed on January 22, 1999.

2. The Asserted Claim is invalid because it is obvious under 35 U.S.C. §103, in light of at least the following prior art references:

- U.S. Patent No. 6,612,940
- U.S. Patent No. 6,486,261
- U.S. Patent No. 5,508,350
- U.S. Patent No. 4,955,613
- U.S. Patent No. 6,486,261
- U.S. Patent No. 4,683,257
- U.S. Patent No. 4,556,220
- U.S. Patent No. 5,252,652
- U.S. Patent No. 6,162,135
- U.S. Patent No. 6,975,131
- Knowledge of one of ordinary skill in the art
- Other art identified by Acushnet in its discovery responses.

3. In proving obviousness, Acushnet will provide evidence to determine the scope and content of the prior art and ascertain the differences between the prior art and the claims.

4. Bridgestone has failed to meet its burden of proof that Acushnet's Accused Product practices the Asserted Claim of the '961 patent.

5. Acushnet's current Accused Product does not practice the Asserted Claim of the '961 patent because it does not contain a rubber composition comprising 100 parts

by weight of a base rubber composed of 20 to 100 wt % of a polybutadiene synthesized using a rare earth catalyst.

6. For substantial periods of time, Acushnet's Accused Product did not practice the Asserted Claim of the '961 patent because it did not contain a rubber composition comprising 100 parts by weight of a base rubber composed of 20 to 100 wt % of a polybutadiene synthesized using a rare earth catalyst.

**D. U.S. Patent No. 5,743,817**

1. Bridgestone is barred from attempting to prove infringement under the doctrine of equivalents because of prosecution history estoppel.

2. None of Acushnet's NXT Tour golf balls bearing the "◀NXT●Tour▶" sidestamp infringe claim 1 of the '817 patent because they lack one or more claim elements, including but not limited to the following:

- a core with a distortion of 2.9 to 4.0 mm under a load of 100 kg;
- a cover consisting of an ionomer resin as a resin component;
- a cover thickness of 1.3 to 1.8 mm; and
- a cover with a Shore D hardness of up to 60.

3. None of Acushnet's NXT Tour golf balls bearing the "◀NXT Tour▶" sidestamp infringe claim 1 of the '817 patent, because they lack one or more claim elements, including but not limited to the following:

- a core with a distortion of 2.9 to 4.0 mm under a load of 100 kg;
- a cover consisting of an ionomer resin as a resin component;
- a cover thickness of 1.3 to 1.8 mm; and
- a cover with a Shore D hardness of up to 60.

4. None of Acushnet's NXT Tour golf balls bearing the "◀NXT-Tour▶" sidestamp infringe claim 1 of the '817 patent, because they lack one or more claim elements, including but not limited to the following:

- a core with a distortion of 2.9 to 4.0 mm under a load of 100 kg;
- a cover consisting of an ionomer resin as a resin component; and
- a cover with a Shore D hardness of up to 60.

5. None of Acushnet's DT So/Lo golf balls bearing the "◀DT So/Lo▶" sidestamp infringe claim 1 of the '817 patent, because they lack one or more claim elements, including but not limited to the following:

- a core with a distortion of 2.9 to 4.0 mm under a load of 100 kg;
- a cover consisting of an ionomer resin as a resin component; and
- a cover with a Shore D hardness of up to 60.

6. None of Acushnet's DT So/Lo golf balls bearing the "DT So/Lo" sidestamp infringe claim 1 of the '817 patent, because they lack one or more claim elements, including but not limited to the following:

- a core with a distortion of 2.9 to 4.0 mm under a load of 100 kg;
- a cover consisting of an ionomer resin as a resin component; and
- a cover with a Shore D hardness of up to 60.

7. None of Acushnet's PTS So/Lo golf balls bearing the "◀PTS So/Lo▶" sidestamp infringe claim 1 of the '817 patent, because they lack one or more claim elements, including but not limited to the following:

- a core with a distortion of 2.9 to 4.0 mm under a load of 100 kg;
- a cover consisting of an ionomer resin as a resin component; and
- a cover with a Shore D hardness of up to 60.

8. None of Acushnet's PTS So/Lo golf balls bearing the "PTS So/Lo" sidestamp infringe claim 1 of the '817 patent, because they lack one or more claim elements, including but not limited to the following:

- a core with a distortion of 2.9 to 4.0 mm under a load of 100 kg;
- a cover consisting of an ionomer resin as a resin component; and
- a cover with a Shore D hardness of up to 60.

9. None of Acushnet's Pinnacle Exception golf balls bearing the Exception airfoil logo sidestamp infringe claim 1 of the '817 patent, because they lack one or more claim elements, including but not limited to the following:

- a core with a distortion of 2.9 to 4.0 mm under a load of 100 kg;
- a cover consisting of an ionomer resin as a resin component; and
- a cover with a Shore D hardness of up to 60.

10. None of Acushnet's Pinnacle Exception golf balls bearing the "Exception" sidestamp infringe claim 1 of the '817 patent, because they lack one or more claim elements, including but not limited to the following:

- a core with a distortion of 2.9 to 4.0 mm under a load of 100 kg;
- a cover consisting of an ionomer resin as a resin component; and
- a cover with a Shore D hardness of up to 60.

11. Bridgestone is estopped from attempting to argue infringement under the doctrine of equivalents for at least the following limitations:

- a core with a distortion of 2.9 to 4.0 mm under a load of 100 kg;
- a cover consisting of an ionomer resin as a resin component; and
- a cover thickness of 1.3 to 1.8 mm.

12. The '817 patent is anticipated under 35 U.S.C. § 102 by JP '673.

13. The Asserted Claim is invalid because it is obvious under 35 U.S.C. §103, in light of at least the following prior art references:

- JP '673
- The Precept EV Extra Spin golf ball
- Knowledge of one of ordinary skill in the art
- Other art identified by Acushnet in its discovery responses

14. In proving obviousness, Acushnet will provide evidence to determine the scope and content of the prior art and ascertain the differences between the prior art and the claims.

**E. U.S. Patent No. 5,782,707**

1. Bridgestone has failed to prove by a preponderance of the evidence that the golf balls bearing the side stamp “Pro V1 392” manufactured by Acushnet at some time between 2000 and 2002 infringe the following limitations of claim 1 of the ‘707 patent:

- “the core center hardness is up to 75 degrees”
- “the core surface hardness is up to 85 degrees”
- “the core surface hardness is higher than the core center hardness by 8 to 20 degrees”
- “the intermediate layer hardness is higher than the core surface hardness by at least 5 degrees”

2. Bridgestone has failed to prove by a preponderance of the evidence that the golf balls bearing the side stamp “Pro V1 392 (stretched)” manufactured by Acushnet at some time between 2000 and 2002 infringe the following limitation of claim 1 of the ‘707 patent:

- “the core center hardness is up to 75 degrees”
- “the core surface hardness is up to 85 degrees”
- “the core surface hardness is higher than the core center hardness by 8 to 20 degrees”
- “the intermediate layer hardness is higher than the core surface hardness by at least 5 degrees”

3. Bridgestone has failed to prove by a preponderance of the evidence that the golf balls bearing the side stamp “◀Pro V1●392▶” manufactured by Acushnet at some time between 2000 and 2002 infringe the following limitations of claim 1 of the ‘707 patent:

- “the core center hardness is up to 75 degrees”
- “the core surface hardness is up to 85 degrees”

- “the core surface hardness is higher than the core center hardness by 8 to 20 degrees”
- “the intermediate layer hardness is higher than the core surface hardness by at least 5 degrees”

4. Claim 1 of the ‘707 patent is invalid under 35 U.S.C. § 103 in light of the pertinent prior art, including:

- European Patent Application EP 0 633 043 A1
- The knowledge of one of ordinary skill in the art
- Core gradient art identified in Dr. Felker’s January 2007 invalidity report that the Court has not excluded Dr. Felker from considering
- Other art identified by Acushnet in its discovery responses

5. In proving obviousness, Acushnet will provide evidence to determine the scope and content of the prior art, ascertain the differences between the prior art and the claims, and resolve the level of ordinary skill in the art.

**F. U.S. Patent No. 5,803,834**

1. Claim 1 of the ‘834 patent is invalid because it is anticipated under 35 U.S.C. § 102 in light of the following:

- Precept EV Extra Spin golf balls (96001) obtained by Acushnet prior to February 27, 1996
- Wilson Ultra Competition golf balls (93049) obtained by Acushnet prior to February 27, 1996

2. Claim 1 of the ‘834 patent is invalid because it is obvious under 35 U.S.C. § 103 in light of at least the following prior art references:

- Core gradient art identified in Dr. Felker’s January 2007 invalidity report that the Court has not excluded Dr. Felker from considering
- Knowledge of one of ordinary skill in the art

- Other art identified by Acushnet in its discovery responses.

3. In proving obviousness, Acushnet will provide evidence to determine the scope and content of the prior art, ascertain the differences between the prior art and the claims, and resolve the level of ordinary skill in the art.

4. Claim 1 of the '834 patent is invalid under 35 U.S.C. § 112.

5. Bridgestone has failed to prove by a preponderance of the evidence that the golf balls bearing the side stamp “◀NXT▶” manufactured by Acushnet infringe at least the following limitations of claim 1 of the '834 patent:

- “a surface hardness is up to 85 degrees”
- “a center hardness is lower than the surface hardness by not less than 8 to less than 20 degrees”
- “a hardness within 5 mm inside the core surface is up to 8 degrees lower than the surface hardness”
- “said cover has a hardness which is higher than the surface hardness of the core by 1 to 15 degrees”

6. Bridgestone has failed to prove by a preponderance of the evidence that the golf balls bearing the side stamp “◀-NXT-▶” manufactured by Acushnet infringe at least the following limitations of claim 1 of the '834 patent:

- “a surface hardness is up to 85 degrees”
- “a center hardness is lower than the surface hardness by not less than 8 to less than 20 degrees”
- “a hardness within 5 mm inside the core surface is up to 8 degrees lower than the surface hardness”
- “said cover has a hardness which is higher than the surface hardness of the core by 1 to 15 degrees”

7. Bridgestone has failed to prove by a preponderance of the evidence that the golf balls bearing the side stamp “DT So/Lo” manufactured by Acushnet infringe at least the following limitations of claim 1 of the ‘834 patent:

- “a surface hardness is up to 85 degrees”
- “a center hardness is lower than the surface hardness by not less than 8 to less than 20 degrees”
- “a hardness within 5 mm inside the core surface is up to 8 degrees lower than the surface hardness”
- “said cover has a hardness which is higher than the surface hardness of the core by 1 to 15 degrees”

8. Bridgestone has failed to prove by a preponderance of the evidence that the golf balls bearing the side stamp “PTS So/Lo” manufactured by Acushnet infringe at least the following limitations of claim 1 of the ‘834 patent:

- “a surface hardness is up to 85 degrees”
- “a center hardness is lower than the surface hardness by not less than 8 to less than 20 degrees”
- “a hardness within 5 mm inside the core surface is up to 8 degrees lower than the surface hardness”
- “said cover has a hardness which is higher than the surface hardness of the core by 1 to 15 degrees”

9. Bridgestone has failed to prove by a preponderance of the evidence that the golf balls bearing the side stamp “◀DT So/Lo▶” manufactured by Acushnet infringe at least the following limitations of claim 1 of the ‘834 patent:

- “a surface hardness is up to 85 degrees”
- “a center hardness is lower than the surface hardness by not less than 8 to less than 20 degrees”

- “a hardness within 5 mm inside the core surface is up to 8 degrees lower than the surface hardness”
- “said cover has a hardness which is higher than the surface hardness of the core by 1 to 15 degrees”

10. Bridgestone has failed to prove by a preponderance of the evidence that the golf balls bearing the side stamp “◀PTS So/Lo▶” manufactured by Acushnet infringe at least the following limitations of claim 1 of the ‘834 patent:

- “a surface hardness is up to 85 degrees”
- “a center hardness is lower than the surface hardness by not less than 8 to less than 20 degrees”
- “a hardness within 5 mm inside the core surface is up to 8 degrees lower than the surface hardness”
- “said cover has a hardness which is higher than the surface hardness of the core by 1 to 15 degrees”

11. Bridgestone has failed to prove by a preponderance of the evidence that the golf balls bearing the side stamp “Exception airfoil logo” manufactured by Acushnet infringe at least the following limitations of claim 1 of the ‘834 patent:

- “a surface hardness is up to 85 degrees”
- “a center hardness is lower than the surface hardness by not less than 8 to less than 20 degrees”
- “a hardness within 5 mm inside the core surface is up to 8 degrees lower than the surface hardness”
- “said cover has a hardness which is higher than the surface hardness of the core by 1 to 15 degrees”

12. Bridgestone has failed to prove by a preponderance of the evidence that the golf balls bearing the side stamp “Exception” manufactured by Acushnet infringe at least the following limitations of claim 1 of the ‘834 patent:

- “a surface hardness is up to 85 degrees”
- “a center hardness is lower than the surface hardness by not less than 8 to less than 20 degrees”
- “a hardness within 5 mm inside the core surface is up to 8 degrees lower than the surface hardness”
- “said cover has a hardness which is higher than the surface hardness of the core by 1 to 15 degrees”

13. Bridgestone is barred from attempting to prove infringement under the doctrine of equivalents because of prosecution history estoppel.

**G. U.S. Patent No. 6,679,791**

1. Claims 11, 13, 16, and 26 of the ‘791 patent are invalid because they are obvious under 35 U.S.C. § 103 in light of at least the following prior art references:

- United States Patent No. 6,390,935
- Other core gradient art identified in Dr. Felker’s January 2007 invalidity report that the Court has not excluded Dr. Felker from considering
- Knowledge of one of ordinary skill in the art
- Other art identified by Acushnet in its discovery responses.

2. In proving obviousness, Acushnet will provide evidence to determine the scope and content of the prior art and ascertain the differences between the prior art and the claims.

3. Claims 11, 13, 16, and 26 of the ‘791 patent are invalid under 35 U.S.C. § 112.

4. Bridgestone has failed to meet its burden of proof to show that the golf balls bearing the side stamp “◀● Pro V1 392 ●▶” manufactured by Acushnet infringe at

least the following limitations of claim 11 of the '791 patent and claim 1, from which it depends:

- “said intermediate layer is composed of a resin material which is harder than the cover and has a greater hardness than the surface of the elastic core when compared using the same hardness scale”
- “said elastic core has a hardness which gradually increases radially outward from the center to the surface thereof and a difference in JIS-C hardness of at least 22 between the center and the surface”

5. Bridgestone has failed to meet its burden of proof to show that the golf balls bearing the side stamp “◀● Pro V1 392 ●▶” manufactured by Acushnet infringe at least the following limitations of claim 13 of the '791 patent:

- “said intermediate layer is composed of a resin material which is harder than the cover and has a greater hardness than the surface of the elastic core when compared using the same JIS-C hardness scale”
- “said elastic core has a hardness at the center and a hardness at the surface thereof which is greater than the hardness at the center thereof, and a difference in JIS-C hardness of at least 22 between the center and the surface”

6. Bridgestone has failed to meet its burden of proof to show that the golf balls bearing the side stamp “◀● Pro V1 392 ●▶” manufactured by Acushnet infringe at least the following limitations of claim 16 of the '791 patent and claim 13, from which it depends:

- “said intermediate layer is composed of a resin material which is harder than the cover and has a greater hardness than the surface of the elastic core when compared using the same JIS-C hardness scale”
- “said elastic core has a hardness at the center and a hardness at the surface thereof which is greater than the hardness at the center thereof,

and a difference in JIS-C hardness of at least 22 between the center and the surface”

- “the intermediate layer has a Shore D hardness of 50 to 67”

7. Bridgestone has failed to meet its burden of proof to show that the golf balls bearing the side stamp “◀● Pro V1 392 ●▶” manufactured by Acushnet infringe at least the following limitations of claim 26 of the ‘791 patent, and claim 24 of the ‘791 patent from which it depends:

- “said intermediate layer is composed of a resin material which is harder than the cover having a Shore D hardness of 45 to 58 and has a greater hardness than the surface of the elastic core when compared using the same JIS-C hardness scale”
- “said elastic core has a hardness at the center and a hardness at the surface thereof which is greater than the hardness at the center thereof, and a difference in JIS-C hardness of at least 22 between the center and the surface”

8. Bridgestone has failed to meet its burden of proof to show that the golf balls bearing the side stamp “◀ Pro V1-392 ▶” manufactured by Acushnet infringe at least the following limitations of claim 11 of the ‘791 patent and claim 1, from which it depends:

- “said intermediate layer is composed of a resin material which is harder than the cover and has a greater hardness than the surface of the elastic core when compared using the same hardness scale”
- “said elastic core has a hardness which gradually increases radially outward from the center to the surface thereof and a difference in JIS-C hardness of at least 22 between the center and the surface”

9. Bridgestone has failed to meet its burden of proof to show that the golf balls bearing the side stamp “◀ Pro V1-392 ▶” manufactured by Acushnet infringe at least the following limitations of claim 13 of the ‘791 patent:

- “said intermediate layer is composed of a resin material which is harder than the cover and has a greater hardness than the surface of the elastic core when compared using the same JIS-C hardness scale”
- “said elastic core has a hardness at the center and a hardness at the surface thereof which is greater than the hardness at the center thereof, and a difference in JIS-C hardness of at least 22 between the center and the surface”

10. Bridgestone has failed to meet its burden of proof to show that the golf balls bearing the side stamp “◀ Pro V1-392 ▶” manufactured by Acushnet infringe at least the following limitations of claim 16 of the ‘791 patent and claim 13, from which it depends:

- “said intermediate layer is composed of a resin material which is harder than the cover and has a greater hardness than the surface of the elastic core when compared using the same JIS-C hardness scale”
- “said elastic core has a hardness at the center and a hardness at the surface thereof which is greater than the hardness at the center thereof, and a difference in JIS-C hardness of at least 22 between the center and the surface”
- “the intermediate layer has a Shore D hardness of 50 to 67”

11. Bridgestone has failed to meet its burden of proof to show that the golf balls bearing the side stamp “◀ Pro V1-392 ▶” manufactured by Acushnet infringe at least the following limitations of claim 26 of the ‘791 patent, and claim 24 of the ‘791 patent from which it depends:

- “said intermediate layer is composed of a resin material which is harder than the cover having a Shore D hardness of 45 to 58 and has a greater hardness than the surface of the elastic core when compared using the same JIS-C hardness scale”
- “said elastic core has a hardness at the center and a hardness at the surface thereof which is greater than the hardness at the center thereof, and a difference in JIS-C hardness of at least 22 between the center and the surface”

12. Bridgestone has failed to meet its burden of proof to show that the golf balls bearing the side stamp “◀● Pro V1x 332 ●▶” manufactured by Acushnet infringe at least the following limitations of claim 11 of the ‘791 patent and claim 1, from which it depends:

- “said intermediate layer is composed of a resin material which is harder than the cover and has a greater hardness than the surface of the elastic core when compared using the same hardness scale”
- “said elastic core has a hardness which gradually increases radially outward from the center to the surface thereof and a difference in JIS-C hardness of at least 22 between the center and the surface”

13. Bridgestone has failed to meet its burden of proof to show that the golf balls bearing the side stamp “◀● Pro V1x 332 ●▶” manufactured by Acushnet infringe at least the following limitations of claim 13 of the ‘791 patent:

- “said intermediate layer is composed of a resin material which is harder than the cover and has a greater hardness than the surface of the elastic core when compared using the same JIS-C hardness scale”
- “said elastic core has a hardness at the center and a hardness at the surface thereof which is greater than the hardness at the center thereof,

and a difference in JIS-C hardness of at least 22 between the center and the surface”

14. Bridgestone has failed to meet its burden of proof to show that the golf balls bearing the side stamp “◀● Pro V1x 332 ●▶” manufactured by Acushnet infringe at least the following limitations of claim 16 of the ‘791 patent and claim 13, from which it depends:

- “said intermediate layer is composed of a resin material which is harder than the cover and has a greater hardness than the surface of the elastic core when compared using the same JIS-C hardness scale”
- “said elastic core has a hardness at the center and a hardness at the surface thereof which is greater than the hardness at the center thereof, and a difference in JIS-C hardness of at least 22 between the center and the surface”
- “the intermediate layer has a Shore D hardness of 50 to 67”

15. Bridgestone has failed to meet its burden of proof to show that the golf balls bearing the side stamp “◀● Pro V1x 332 ●▶” manufactured by Acushnet infringe at least the following limitations of claim 26 of the ‘791 patent, and claim 24 of the ‘791 patent from which it depends:

- “said intermediate layer is composed of a resin material which is harder than the cover having a Shore D hardness of 45 to 58 and has a greater hardness than the surface of the elastic core when compared using the same JIS-C hardness scale”
- “said elastic core has a hardness at the center and a hardness at the surface thereof which is greater than the hardness at the center thereof, and a difference in JIS-C hardness of at least 22 between the center and the surface”

16. Bridgestone has failed to meet its burden of proof to show that the golf balls bearing the side stamp “◀ Pro V1x-332 ▶” manufactured by Acushnet infringe at least the following limitations of claim 11 of the ‘791 patent and claim 1, from which it depends:

- “said intermediate layer is composed of a resin material which is harder than the cover and has a greater hardness than the surface of the elastic core when compared using the same hardness scale”
- “said elastic core has a hardness which gradually increases radially outward from the center to the surface thereof and a difference in JIS-C hardness of at least 22 between the center and the surface”

17. Bridgestone has failed to meet its burden of proof to show that the golf balls bearing the side stamp “◀ Pro V1x-332 ▶” manufactured by Acushnet infringe at least the following limitations of claim 13 of the ‘791 patent:

- “said intermediate layer is composed of a resin material which is harder than the cover and has a greater hardness than the surface of the elastic core when compared using the same JIS-C hardness scale”
- “said elastic core has a hardness at the center and a hardness at the surface thereof which is greater than the hardness at the center thereof, and a difference in JIS-C hardness of at least 22 between the center and the surface”

18. Bridgestone has failed to meet its burden of proof to show that the golf balls bearing the side stamp “◀ Pro V1x-332 ▶” manufactured by Acushnet infringe at least the following limitations of claim 16 of the ‘791 patent and claim 13, from which it depends:

- “said intermediate layer is composed of a resin material which is harder than the cover and has a greater hardness than the surface of the elastic core when compared using the same JIS-C hardness scale”

- “said elastic core has a hardness at the center and a hardness at the surface thereof which is greater than the hardness at the center thereof, and a difference in JIS-C hardness of at least 22 between the center and the surface”
- “the intermediate layer has a Shore D hardness of 50 to 67”

19. Bridgestone has failed to meet its burden of proof to show that the golf balls bearing the side stamp “◀ Pro V1x-332 ▶” manufactured by Acushnet infringe at least the following limitations of claim 26 of the ‘791 patent, and claim 24 of the ‘791 patent from which it depends:

- “said intermediate layer is composed of a resin material which is harder than the cover having a Shore D hardness of 45 to 58 and has a greater hardness than the surface of the elastic core when compared using the same JIS-C hardness scale”
- “said elastic core has a hardness at the center and a hardness at the surface thereof which is greater than the hardness at the center thereof, and a difference in JIS-C hardness of at least 22 between the center and the surface”

20. Bridgestone is barred from attempting to prove infringement under the doctrine of equivalents.

#### **H. Laches**

1. Bridgestone delayed filing suit for an unreasonable and inexcusable length of time and its delay operated to the prejudice and/or injury of Acushnet.

#### **I. Damages**

1. Bridgestone’s damages claim based on an alleged reasonable royalty of \$146.5 million, generated by applying between 7.0 and 8.5 percent to report Acushnet

worldwide dollar sales of alleged infringing golf balls, is grossly inflated and unsupported.

2. Bridgestone cannot prove by a preponderance of the evidence that it is entitled to this in damages. In particular, Mr. Jarosz's opinion related to the likely outcome of the hypothetical negotiation between Bridgestone and Acushnet is unreliable, the wrong analysis for this industry, and speculative guesswork. It is further flawed in assuming that the Bridgestone patents-in-suit are valid and infringed, which they are not.

3. Assuming that Acushnet infringes any of the Bridgestone patents, if valid, the most likely result of a hypothetical negotiation between Bridgestone and Acushnet with respect to the Bridgestone patents would have been a non-exclusive license involving a lump-sum royalty payment by Acushnet to Bridgestone of \$1,487,555 at or about the time leading up to July 2000.

4. Although less likely, another possible outcome of this negotiation would be a lump-sum payment by Acushnet in the amount of \$8,597,285. The available evidence, in fact, suggests that the outcome of such a negotiation may well have generated lower royalty rates and resulting damage calculations.

### **ACUSHNET PATENTS**

#### **A. U.S. Patent No. 6,818,705**

1. The Bridgestone Tour B330 golf ball infringes claim 4 of the '705 patent.
2. The Precept U-Tri Extra Distance golf ball infringes claim 4 of the '705 patent.
3. The Precept U-Tri Extra Spin golf ball infringes claim 4 of the '705 patent.
4. The Nike One Black golf ball infringes claim 4 of the '705 patent.
5. The Nike One Platinum golf ball infringes claim 4 of the '705 patent.
6. The Nike One Gold golf ball infringes claim 4 of the '705 patent.

7. The Nike One TW golf ball infringes claim 4 of the '705 patent.

8. Acushnet will rebut Bridgestone's claim that the '705 patent is invalid under 35 U.S.C. § 102.

9. Acushnet will rebut Bridgestone's claim that the '705 patent is invalid under 35 U.S.C. § 103.

10. Acushnet will rebut Bridgestone's claim that the '705 patent is invalid under 35 U.S.C. § 112.

**B. U.S. Patent No. 4,729,861**

1. The Precept U-Tri Tour golf ball infringes claim 1 of the '861 patent.

2. The Precept Laddie golf ball infringes claim 1 of the '861 patent.

3. The Bridgestone Tour B330 golf ball infringes claim 1 of the '861 patent.

4. Acushnet will rebut Bridgestone's claim that the '861 patent is invalid under 35 U.S.C. § 102.

5. Acushnet will rebut Bridgestone's claim that the '861 patent is invalid under 35 U.S.C. § 103.

6. Acushnet will rebut Bridgestone's claim that the '861 patent is invalid under 35 U.S.C. § 112.

**C. U.S. Patent No. 4,936,587**

1. The Precept U-Tri Tour golf ball infringes claim 1 of the '587 patent

2. The Precept Laddie golf ball infringes claim 1 of the '587 patent.

3. The Bridgestone Tour B330 golf ball infringes claim 1 of the '587 patent.

4. The Precept U-Tri Tour golf ball infringes claim 26 of the '587 patent.

5. Acushnet will rebut Bridgestone's claim that the '587 patent is invalid under 35 U.S.C. § 102.

6. Acushnet will rebut Bridgestone's claim that the '587 patent is invalid under 35 U.S.C. § 103.

7. Acushnet will rebut Bridgestone's claim that the '587 patent is invalid under 35 U.S.C. § 112.

**D. U.S. Patent No. 5,080,367**

1. The Precept U-Tri Tour golf ball infringes claim 1 of the '367 patent.  
2. The Precept Laddie golf ball infringes claim 1 of the '367 patent.  
3. The Bridgestone Tour B330 golf ball infringes claim 1 of the '367 patent.  
4. Acushnet will rebut Bridgestone's claim that the '367 patent is invalid under 35 U.S.C. § 102.

5. Acushnet will rebut Bridgestone's claim that the '367 patent is invalid under 35 U.S.C. § 103.

6. Acushnet will rebut Bridgestone's claim that the '367 patent is invalid under 35 U.S.C. § 112.

**E. Damages**

1. Acushnet intends to prove at trial that Bridgestone's infringement of the '705 and '861, '587 and '367 patents has damaged Acushnet, and that it is entitled to a reasonably royalty in the form of a lump-sum payment, plus pre-judgment and post-judgment interest and costs as fixed by the Court, pursuant to 35 U.S.C. § 284 and 28 U.S.C. § 1961.

2. Acushnet intends to prove at trial that Bridgestone's infringement of the '705 and '861, '587 and '367 patents has damaged Acushnet, and that it is entitled to a reasonably royalty in the form of a lump-sum payment, plus pre-judgment and post-judgment interest and costs as fixed by the Court, pursuant to 35 U.S.C. § 284 and 28 U.S.C. § 1961.

3. Acushnet intends to prove that the most likely result of a hypothetical negotiation between Bridgestone and Acushnet with respect to '861, '587 and '367 patents would have resulted in a lump-sum payment by Bridgestone to Acushnet of

\$46,520 at or about the time leading up to January 2002, and that the most likely outcome of a hypothetical negotiation concerning the '705 patent would have resulted in a lump-sum payment by Bridgestone to Acushnet of \$3,334 at or about the time leading up to November 2004.

4. Acushnet will also demonstrate that it is entitled to a permanent injunction against Bridgestone, preventing Bridgestone from further infringing the '705 patent.

# EXHIBIT 14

**EXHIBIT 14**

**BRIDGESTONE'S MISCELLANEOUS ISSUES**

1. **The bifurcation, separation, and order of issues for trial.**

a. The Court has previously bifurcated and stayed the issue of willful infringement for both discovery and trial. (D.I. 158, Aug. 2, 2006 Tr. at 23)

b. For Bridgestone's claims of patent infringement against Acushnet: Bridgestone proposes staging the litigation in two phases. The first phase will include all issues concerning Bridgestone's claims of patent infringement and damages against Acushnet. The second phase to follow immediately thereafter will include all issues concerning Acushnet's claims of invalidity of the Bridgestone's patents-in-suit.

c. For Acushnet's claims of patent infringement against Bridgestone: Bridgestone proposes bifurcating and staying all such claims until Bridgestone's claims of patent infringement are tried. Bridgestone is seeking damages of at least \$146 million for the alleged infringement by Acushnet of the seven Bridgestone patents-in-suit. On the other hand, for the alleged infringement by Bridgestone of the four Acushnet patents-in-suit, Acushnet is seeking less than \$50,000 in damages for a fullypaid-up license. Accordingly, to conserve the time, expense and resources of the parties and this Court and to avoid jury confusion, Bridgestone proposes that all issues and claims concerning Acushnet's four patents-in-suit be bifurcated from Bridgestone's claims. Bridgestone proposes trying the validity and infringement issues related to the Acushnet patents-in-suit at some later time, if at all.

2. **The Trial Schedule, including the time allotted for each side.**

Bridgestone proposes the trial of the infringement, damages and validity issues for the seven Bridgestone patents-in-suit will take ten (10) days.

3. **New Witnesses**

Acushnet's witness list identifies current Acushnet employees who were not identified on Acushnet's initial disclosures or interrogatory answers as fact witnesses. Bridgestone moves to preclude Acushnet from calling to trial any fact witness that was not appropriately identified.

4. **Exhibit Identification**

Bridgestone proposes the following term for the joint pre-trial order:

The parties shall identify the exhibits to be used on direct examination at least 48 hours before using those exhibits (except for adverse witnesses being called in the party's case-in-chief) and the other party shall assert any objections to those exhibits within 24 hours thereafter.

Acushnet removed this term from the joint pre-trial order. Bridgestone asks that the Court include this provision in the pre-trial order.

5. **Acushnet's 35 U.S.C. § 282 Statement**

Acushnet's purported Section 282 statement does not conform to Section 282. Acushnet purports to rely "on the invalidity defenses and prior art previously identified in [its] discovery responses, expert reports and pretrial exhibit lists." This is improper because it fails to disclose the specific information required by 35 U.S.C. § 282. Moreover, because the Court has ordered Acushnet to pare down its prior art defenses and has excluded Acushnet from relying on art that Acushnet now says it will rely on, Acushnet's purported Section 282 statement is further improper.

# EXHIBIT 15

**EXHIBIT 15**

**ACUSHNET'S MISCELLANEOUS ISSUES**

1. **The bifurcation, separation, and order of issues for trial.**

Acushnet does not agree to Bridgestone's proposal to stage the litigation in two phases, as described in Exhibit 14.1.b or to bifurcate Acushnet's infringement claims, as described in Exhibit 14.1.c. The litigation should be tried all at once with the order of proof as follows:

- (1) Bridgestone's infringement case against Acushnet;
- (2) Acushnet's non-infringement response;
- (3) Acushnet's invalidity defense;
- (4) Acushnet's infringement case against Bridgestone;
- (5) Bridgestone's invalidity reply;
- (6) Bridgestone's non-infringement response; and

2. **The Trial Schedule**

Acushnet believes trial of all issues regarding the eleven patents-in-suit could take over two weeks. However, if the court allots only two weeks for trial, Acushnet proposes that all of the issues regarding the eleven patents-in-suit should be completed in that time.

3. **Jury Instructions**

Acushnet proposes that the parties have the opportunity to supplement the final jury instructions before the final charging conference.

4. **Jury Notebooks**

Acushnet proposes that the jurors be provided with notebooks in which they are permitted to take handwritten notes during the presentations of the parties and that jurors be

permitted to bring these handwritten notes into the deliberation room.